Department of Conservation
Te Papa Atawhai

Briefing: Access charging - summary of submissions

To	Minister of Conservation	**Date submitted**	3 July 2025
Action sought	**Approve** the publication of the access charging summary of submissions	**Priority**	Normal
Reference	25-B-0264	**DocCM**	DOC-10357036
Security Level	In Confidence	**Timeframe**	16 July 2025
Risk Assessment	Low. The risks of publishing the summary of submissions are low. Most submitters were opposed to charging New Zealanders for access, which aligns with your proposal to only charge international visitors.		
Attachments	Attachment A – Access charging summary of submissions		

Contacts	
Name and position	**Phone**
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Purpose – Te aronga

1. To seek your approval to publish the summary of submissions on access charging [**Attachment A**] once the Government has announced its decision on your proposal.

The summary of submissions provides an overview of what we heard during public consultation

2. The public consultation on exploring charging for access to some public conservation land (**PCL**) started on 15 November 2025 and closed on 28 February 2025. The attached summary of submissions provides an overview of what we heard from submitters, including:
    - the number of submitters who responded and the groups of submitters who responded

- a summary of feedback for each consultation question posed in the discussion document
- themes from submissions that could be considered out of scope but are still important to note.

3. As we developed the summary of submissions, we used our submissions analysis to inform our policy advice to you. If Cabinet agrees to progress access charging, the summary of submissions will also be used to inform future advice and implementation planning.

4. Public consultation on access charging ran in parallel with public consultation on proposals to modernise conservation land management. A summary of submissions report on modernising conservation land management is being prepared separately.

5. You may find the summary of submissions report useful in supporting your discussions with your colleagues on access charges at Cabinet Economic Policy Committee (**ECO**) and at Cabinet later this month. Table 1 sets out the forward timeline of other advice and supporting material we will provide you.

Table 1 - Forward timeline of advice and supporting material

Date	Item
9 July	Cabinet paper memo including: • talking points • draft press release • key messages • questions and answers.
16 July 2025	*ECO*
17 July 2025	Briefing on materials for proactive release
21 July 2025	*Cabinet*
21 July 2025	Post-Cabinet announcement on next steps

The risks from publishing the summary of submissions are low

6. If Cabinet agrees with your recommendation to exempt New Zealanders from access charging, publishing the summary of submissions will be low risk because it aligns with what we heard from submitters. When asked who should pay an access charge, most submitters supported charging international visitors (72 percent).

7. We would expect tourism businesses to be particularly sensitive to charging international visitors for access. Their submissions returned a range of views. 18 tourism businesses supported or strongly supported charging international visitors, while 11 opposed or strongly opposed. Three were neutral.

8. We recommend making the summary of submissions publicly available because:

   a) Making summaries of submissions publicly available is ‘standard practice’ as it supports Government’s transparency and accountability, and will inform the select committee process for the Bill (if it is progressed);

   b) Submitters who see their views captured in a summary of submissions will know that they have been heard. They may be more likely to engage in future public consultations; and

   c) It will likely be subject to an official information request if not proactively released.

Next steps – Ngā tāwhaitanga

9. Pending your approval, we will finalise the report for publishing. This may include making minor editorial and technical changes to the document, as well as design. The report will then be published on DOC's website following public announcements on access charges, currently expected to occur post-Cabinet on 21 July.

10. We will work with your office on the announcements post-Cabinet and the release of any material, such as the summary of submissions and DOC's wider proactive release of advice.

We recommend that you … (Ngā tohutohu)

		Decision
a)	**Approve** the publication of the summary of submissions on access charging (Attachment A) on DOC's website once Cabinet has made decisions on the proposal.	Yes / No
b)	**Note** that we may make minor editorial and technical changes to the report prior to its publication.	Note
c)	**Note** that we will work with your office on the announcements post-Cabinet and the release of any material, such as DOC's wider proactive release of advice.	Note

s9(2)(a)

Date: 03/07/2025

Angela Bell
Acting Policy Director (Biodiversity, Funding, International and Marine)

Date: / /

Hon Tama Potaka
Minister of Conservation

ENDS

Department of Conservation
Te Papa Atawbai

Te Kāwanatanga o Aotearoa
New Zealand Government

Exploring charging for access to some public conservation land

Summary of Submissions

July 2025

Cover: Milford Sound / Piopiotahi. *Photo: Galyna Andrushko*

Exploring charging for access to some public conservation land: Summary of Submissions

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Executive summary

This report summarises the Department of Conservation's (DOC) analysis of submissions on the discussion document *Exploring charging for access to some public conservation land* (the discussion document).[1] Consultation ran from 15 November 2024 to 28 February 2025.

Submissions received

DOC received 7,412 submissions on the discussion document. Forest & Bird form submissions account for 65 percent of all submissions (4,836 submissions). Of the remaining 2,576 submissions, approximately 93 percent came from individuals and 7 percent came from Iwi and Hapū, and a wide range of groups, organisations and businesses.

Major themes

Almost half of submitters did not agree with the rationale for introducing access charges outlined in the discussion document. Many thought the conservation funding gap should be addressed through more Crown funding, not by introducing additional charges. Many submitters noted recent cuts to DOC's budget and perceived that conservation has been chronically underfunded. Some submitters suggested focusing on other ways to generate revenue to address the funding gap, such as more car parking charges, introducing road tolls, and increasing hut charges and concession fees.

Some queried or pushed back on DOC's role in managing tourism and using access charging to enhance visitor experiences. Some disagreed with applying the 'user pays' principle to public conservation land (PCL) because conservation is a public good that non-users still benefit from.

Over a third of submitters supported the rationale for introducing access charges. These submitters viewed access charging as a useful tool for funding conservation, maintaining or improving visitor infrastructure, fairly sharing costs across visitors, and reducing visitor pressure at popular sites.

The majority of submitters opposed charging everyone for access (86 percent). Most of these submitters opposed charging for everyone because they viewed an access charge as a restriction of their basic right, as New Zealanders, to access PCL (rather than viewing an access charge as a way of funding the

[1] The original discussion document can be accessed online: https://www.doc.govt.nz/globalassets/documents/getting-involved/consultations/2024/access-charging/exploring-charging-for-access-to-some-public-conservation-land-discussion-document.pdf

upkeep, development, and maintenance of visitor and recreational infrastructure). Many noted that they already contribute to PCL costs through taxes, and that access charges would create a financial barrier, disproportionately affecting poorer communities. Many hunters and conservation volunteers said that access charging would impact on their contributions to positive conservation outcomes. Many submitters, especially conservation groups, said that access to PCL is important for people's connection to nature, health, education and environmental protection.

The most common reasons submitters supported access charging was to enable visitors to contribute to the upkeep of places they visit and to provide for the ongoing protection of PCL. This was particularly in relation to charging international tourists, and in areas where visitor pressure is unsustainable. Some submitters also said that access charging would be a useful conservation management tool, that it aligns with international practice, and would enable costs to be shared more fairly between visitors, and between visitors and taxpayers. Most of these submitter's support was conditional on the design of the access charge, for example only charging international visitors, or only charging where visitor numbers are unsustainable, or only charging for certain popular tourist areas.

When asked who should pay an access charge, most submitters supported charging international visitors (72 percent). These submitters noted that international visitors do not contribute to conservation work or maintaining PCL through taxes, and that their high numbers put more pressure on some locations.

Many of those who opposed charging international visitors said they already contribute through the International Visitor Conservation and Tourism Levy (IVL). It is unclear if all such submitters were aware that approximately half of international visitors are exempt. Some said that the IVL is the most efficient mechanism for collecting a contribution from international visitors, either as an access charge at the border, or through an increased IVL rate. There was also concern that charging could impact on visitor demand, by deterring tourists from visiting PCL.

Many submitters supported limiting access charges to some areas of PCL, including areas popular with international visitors and facing unsustainable visitor pressure. The most mentioned places included the Tongariro Alpine Crossing, Aoraki / Mt Cook, Piopiotahi / Milford Sound, and the Great Walks across New Zealand.[2] Many submitters said the access charges should not be used in the backcountry and open hunting areas, inaccessible, remote and low-

[2] The Great Walks of New Zealand include the Milford Track, the Routeburn Track and the Kepler Track, among others.

use areas, areas where most visitors are New Zealanders or locals, and culturally significant places to mana whenua and tangata whenua.

Many submitters supported investing revenue in the place it is collected, including to meet management and maintenance needs. There was also support for investing any surplus revenue back into the region, or on priority projects nationally (or some combination). Many submitters said that revenue should be used for conservation and/or visitor purposes, not for any other government spending.

Many submitters noted the importance of meaningful partnership, collaboration and consultation with Iwi and Hapū on conservation matters. Many noted that Iwi and Hapū must have a role in decision-making on how revenue is used, that a portion of revenue should be allocated directly to Iwi and Hapū to support their role as kaitiaki, and the Government must ensure that mana whenua can freely connect with their ancestral lands and perform customary tikanga.

There was a strong theme from Iwi, Hapū and other Māori organisations that made submissions that the Government must uphold Treaty of Waitangi (the Treaty) principles, respect the rights and responsibilities of mana whenua as kaitiaki, provide meaningful partnership in decision-making, and align with commitments set out in Treaty Settlement arrangements. There was unanimous opposition from Iwi, Hapū and Māori organisations to charging mana whenua within their rohe.

Many individual submitters did not support allowing groups other than DOC to charge for access because it was perceived to be inappropriate for other groups to take on collection and enforcement roles. Submitters considered that other groups could set charges too high, and could lack oversight, accountability and transparency. However, many groups (such as conservation groups) submitted that other groups managing land with conservation values should receive some revenue from access charges for their contributions to conservation.

Submitters provided useful additional insights on the role of access charging in managing visitor demand, the need for system oversight and safeguards, and key considerations for implementation (e.g. pricing, compliance, and interactions with existing charges and legislation).

Introduction

Purpose of this document

This report summarises the submissions the Department of Conservation (DOC) received during public consultation on the discussion document *Exploring charging for access to some public conservation land* (the discussion document).[3]

This document does not cover submissions DOC received on the *Modernising Conservation Land Management* discussion document, which went out for public consultation at the same time, as these will be captured in a separate document. This will be published later in 2025.

About the proposal

Access charges are charges made to enter a specific area. Access charges in protected natural areas (e.g. national parks) can take various forms. For example:

- a per person fee to enter a protected natural area (single ticket or pass)
- a per vehicle fee to drive on a particular road into a protected natural area
- a per person fee to walk or ride on a particular track.

Governments around the world use access charges to help fund the maintenance, operation and improvement of visitor attractions, such as national parks and museums.

The Government consulted the public on whether access charging is a good idea, and on key design questions for an access charging system, including:

- who to charge – at a high level, who access charging should apply to
- where to charge – what features might make a place suitable or not for an access charge
- how to allocate funding – where the focus of funding from access charges should be directed.

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[3] The original discussion document can be accessed online: https://www.doc.govt.nz/globalassets/documents/getting-involved/consultations/2024/access-charging/exploring-charging-for-access-to-some-public-conservation-land-discussion-document.pdf

Current legislation does not clearly enable the use of access charges. Implementing an access charge would likely require changes to the Conservation Act 1987, National Parks Act 1980, and Reserves Act 1977.

Consultation process

Public consultation on access charging ran from 15 November 2024 to 28 February 2025.

To inform the consultation, a discussion document *Exploring charging for access to some public conservation land* was published on the DOC website on 15 November 2024, alongside a slide pack that summarised the proposal. Links to publicly available Cabinet papers and advice were also provided.

Submitters were invited to submit their views using a survey on DOC's website or by email to a consultation inbox (accesschargingconsultation@doc.govt.nz).

Submitters using the online survey could respond to the questions in the discussion document, with the option of answering all or some of the questions. Submitters could also add written feedback, provide additional supporting information, or both. The online survey questions are set out in Appendix 1.

DOC held 25 regional hui with Iwi and Hapū, which provided an initial introduction to the access charging proposal, and an early opportunity for Treaty partners to provide feedback.

A summary of the feedback heard during the hui can be found in Appendix 2. The insights from regional hui helped inform DOC's advice but have not been treated as formal submissions. This is because some Iwi and Hapū provided their formal feedback in writing as part of the consultation process.

DOC also held four stakeholder engagements and four public information sessions during the consultation period. These informed attendees of the proposal and gave opportunities for questions and feedback.

Approach to analysis

Responses to each consultation question have been summarised using a qualitative thematic analysis. Where possible, the notable views of Iwi and Hapū and stakeholder groups have been provided.

Words like 'some,' 'many,' or 'most' give an indication of how many submitters held a particular view amongst those that submitted on the topic, but they do not represent specific percentages of submitters.

Statistics on specific questions have been provided where possible. Note that percentages across the document may not sum, as they are rounded to the

nearest whole number. Not every submitter responded to all consultation questions. Blank or missing answers were not counted in the statistics.

There were three types of submission: responses to DOC's online survey, free form 'unique' submissions, and Forest & Bird form submissions.[4]

'Unique' and online survey submissions came from both interested individuals and groups, organisations and businesses in different proportions (see Table 1). Submissions from individuals and groups have equal weighting in the overall statistics.

Table 1: Proportion of 'unique' and online survey submissions that were received from interested individuals vs groups, organisations and businesses

	'Unique' submissions	Online survey submissions
Proportion of individual submitters	59%	96%
Proportion of group, organisation and business submissions	41%	4%

The statistics cited in this document come from 'unique' and online survey submissions only.

Forest & Bird form submissions made up approximately two-thirds of all submissions. This form did not respond to the specific consultation questions, so could not be used in the statistics. Forest & Bird form submissions were included in the overall qualitative thematic analyses of submitters' views. See Appendix 3 for a copy of the form submission.

See Appendix 4 for a more detailed methodology.

How to read this document

This document provides an overview of what was heard from submitters. It briefly discusses the number of submitters who responded and the groups of submitters who responded.

It is then organised around the consultation questions posed in the discussion document – giving a summary of feedback received on each question. Some questions are grouped together where it makes sense. Section 9 includes additional key themes of comments from submitters that were not made in response to a specific question.

[4] 'Form' submissions refer to submissions that were made using a pre-filled template.

The specific views of different types of submitters have been highlighted under key questions, and where appropriate, DOC has grouped the various submissions as follows:

- 'Iwi and Hapū and Māori organisations' includes views from Treaty partners and some individual Iwi and Hapū members.
- 'Recreation, hunting and fishing groups' includes views from not-for-profits, clubs, and some NGOs.
- 'Conservation boards and environmental groups' includes views from conservation boards, community environmental groups, and national environmental NGOs.
- 'Tourism stakeholders' includes views from tourism businesses, industry groups, and regional tourism organisations.

Glossary

Term	Explanation
Concession	A type of permission given by the Department of Conservation to a business or organisation to carry out an activity on public conservation land. It can be a lease, licence, permit or easement.
Concessionaire	A business or organisation that holds a concession.
Differential pricing	Using different prices for groups with defined characteristics (e.g. international versus domestic visitors).
Discounts	A discount means a reduction from the specified charge (variable rates of discounts can be provided for different groups or activities).
DOC	The Department of Conservation.
Exemptions	An exemption means an entry charge will not apply.
Form submission	Submissions that were made using a pre-filled template.
IVL	International Visitor Conservation and Tourism Levy
Kaitiaki, Kaitiakitanga	Guardian, trustee, minder. Kaitiakitanga refers to the obligation to nurture and care for the mauri (life force, vital essence) of a taonga. It is an ethic of guardianship and protection.
Public Conservation Land (PCL)	Public conservation land is land in New Zealand that is protected and managed by the Government to preserve its natural, cultural and historic values.
Rohe	Boundary, district, region, territory, area.

Taonga	Treasure, anything prized. This is applied to anything considered to be of value including socially or culturally valuable objects, resources, phenomena, ideas and techniques.
Tikanga	A custom, practice or correct protocol. It refers to the customary system of values and practices that have developed over time and are deeply embedded in the social context.
'Unique' submission	For the purposes of this document, 'unique' submissions are free form submissions DOC received via the consultation inbox: accesschargingconsultation@doc.govt.nz.
User pays	The person who uses a service or product is the one who pays for it.

Acknowledgements

DOC is grateful to everyone who joined discussions and meetings, raised questions, and provided feedback. The submissions and engagement have been constructive and valuable, with contributors bringing many different perspectives, including tangata whenua perspectives and perspectives from commercial, recreation, conservation, local government, and other organisations.

What DOC heard

1. Introduction to submissions

DOC received 7,412 submissions in total, including Forest & Bird form submissions, online survey responses and free form 'unique' submissions (see Table 2).

Table 22: Number of submissions

Type of submission	Number of submissions	Proportion of total submissions
Forest & Bird form submissions	4,836 (1,305 had additional comments)	65%
Online survey responses	2,339	32%
'Unique' (free form) submissions	237	3%

Of the online survey and 'unique' submissions, around 93 percent came from individuals. The remaining 7 percent were comprised of a range of groups, organisations and businesses (see Figure 1).

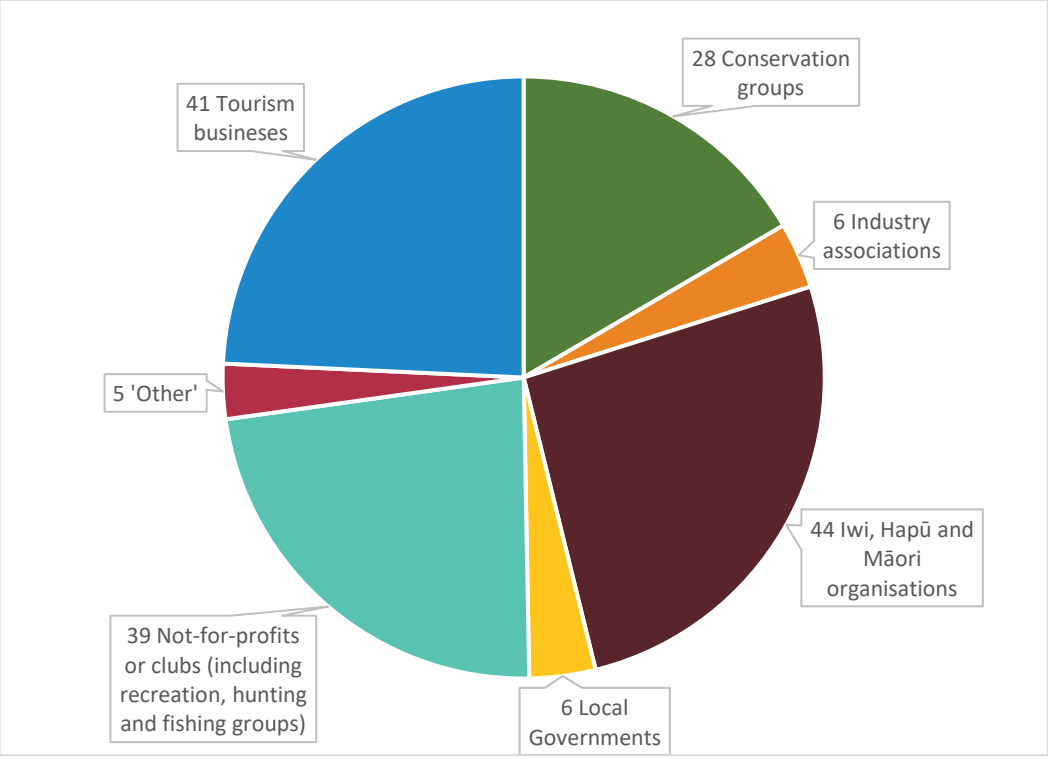

Figure 1: Composition of submissions from non-individuals

2. Issues

The discussion document set out key funding challenges facing conservation, including:

- the rising costs of replacing assets, and maintaining and improving facilities such as tracks, bridges and carparks, and other visitor facilities
- pressure from increased visitor numbers at some sites
- increased severe weather events and their impact on DOC's facilities maintenance costs
- declining biodiversity and the risk of loss of unique species and ecosystems.

The discussion document highlighted that more investment is needed to sustain the visitor network so that is it safe, accessible and delivers quality experiences, and to address New Zealand's declining biodiversity. It also highlighted that more could be done to ensure costs are shared fairly among visitors (particularly between people using short walks compared to other users) and between taxpayers and visitors.

DOC asked:

#	Questions
1	Do you agree with the issues and how they have been presented?
2	a. Have any issues been missed? b. Do you have any examples or data that demonstrate your view on the issues?

What DOC heard from consultation:

Question 1. Do you agree with the issues and how they have been presented?

Statistics based on responses to the online survey indicate that most submitters disagreed with the issues and how they were presented (see Table 3). 'Unique' submitters talked about a range of issues, but their views could not be summarised quantitatively.

Table 33: Statistics on submissions responding to Q1

Online survey responses to Q1 *74% (1,730) of online survey submitters responded*					
Strongly agree	Agree	Disagree	Strongly disagree	Neutral	Unsure
10% (176)	25% (431)	17% (289)	32% (558)	14% (245)	2% (31)
35% (607)		49% (847)		16% (276)	

Almost half of submitters disagreed with the issues set out in the discussion document, or thought there were issues missing

Many of these submitters believed that the funding gap for conservation should be addressed by central government through additional Crown funding, not through additional charges like access charging. Some submitters noted the recent decrease in the Conservation budget or said that DOC has never been adequately funded and "rides a continual boom and bust funding cycle," (Environmental Defence Society). Others believed the funding gap was due to DOC spending funding inefficiently, or on the wrong priorities.

Trojan Holdings

"If the objective of this review is to enhance DOC's financial performance and contribution to the Crown accounts, then any review needs to include a review of DOC's own internal cost structures, procurement value for money for various inputs, and general measures to improve financial performance across the organisation could be considered."

Some submitters queried or pushed back on DOC's role in managing tourism and using revenue from access charges to enhance visitor experiences. Others were concerned about the negative economic, social, and environmental impacts of tourism. Some submitters were also concerned about the commercialisation of PCL.

Eugenie Sage, former Minister of Conservation

"'Enhancing visitor experiences'… creates the wrong driver and will exacerbate the trend for increased spending on visitor management …it will become a reason for ignoring or overlooking impacts on natural character and habitat."

Some submitters disagreed with applying the 'user pays' principle to public conservation land (PCL) because of perceptions that conservation is a public good that non-users still benefit from.

Just over a third of respondents supported the rationale set out for introducing access charges

These submitters viewed access charging as a useful tool to provide funding for delivering better conservation outcomes as well as ensuring better tourism

infrastructure and helping maintain existing conservation facilities (particularly in the context of rising environmental and weather challenges).

> **Interested Individual**
>
> *"Recovering costs from users is a fair way to fund the maintenance of the natural resources which provide the primary reason for users to visit, and for funding the provision and maintenance of any services they use. It also encourages a more responsible approach to use of the resource."*

Access charging was also seen as a more equitable or 'fairer' way of sharing the costs of conservation management across visitors and as a smarter way to reduce pressure on high priority sites.

Some submitters proposed alternative options for raising revenue

For example, some submitters suggested that the IVL could offer a simpler and more administratively efficient way to collect contributions from international visitors. Further revenue examples are discussed in Section 3, in response to Question 5.

Questions 2a and 2b. Have any issues been missed? And do you have any examples or data that demonstrate your view on the issues?

Thirty percent of submitters felt that the discussion document had missed key issues

Of that thirty percent, many thought that the contributions of third parties (such as volunteers and hunters) to maintaining PCL, tracks and facilities had not been properly recognised. Some thought that there should be recognition that third parties also need secure funding to support their maintenance work on PCL. These submitters also noted that an access charge could compromise the ability of these voluntary conservation groups to raise money in the future.

> **New Zealand Game Animal Council**
>
> *"…the issues presented are those that relate to DOC directly. There is no presentation or acknowledgement of externalities such as cost-of-living pressures, the positive and negative impacts of the proposals on local communities, the impact of the proposed fees on visitor numbers, and the introduction (and subsequent increase) of the International Visitor Levy (IVL)"*

The Federated Mountain Clubs (FMC) disagreed with the problem definition, saying there needed to be a national discussion on what is a sustainable number of international visitors. They argued that the backcountry hut and track network is in good condition after a "huge amount of maintenance and restoration work" by skilled volunteers and considered the discussion document gives a "partial and incorrect picture of the state of DOC's assets."

Others noted that the discussion document failed to recognise the wider benefits and opportunities arising from good conservation management. Submitters talked about the benefits of ecosystem services (e.g. supporting primary

production or providing clean water), social, health and recreational benefits, and supporting the resilience of New Zealand's natural environments.

Some Iwi and Hapū noted the discussion document did not canvass the issue of ensuring that tangata whenua have access to their important places, that their customary rights are recognised, and the protection and management of culturally significant sites. They submitted that the discussion document did not sufficiently recognise the relationship Māori have with conservation land in their rohe.

Many submitters were concerned about price becoming a barrier to access

Many submitters expressed concern that charging for access will introduce a financial barrier, inhibiting and/or discouraging access to PCL. The majority of the submitters who opposed access charging held this view.

Interested individual

"Implementing access charges would create an inequitable system that disproportionately affects our most vulnerable communities. Young people, low-income families, and those already facing financial hardships would effectively be locked out of these spaces."

Many submitters saw introducing charges for access as contrary to DOC's objective of increasing access to PCL.

Submitters considered this as an equity issue – one that would disproportionately impact disadvantaged communities, including low-income communities, students, and minority communities.

Some submitters went on to identify unintended consequences arising from introducing a price barrier. These included:

- inhibiting people's ability to learn, explore, and connect with nature
- undermining the food security of those hunters and fishers who rely on wild game and catch to feed their families
- poorer physical and mental health outcomes for those who cannot afford access.

Many submitters identified differential pricing as one way to mitigate the potential unequitable impacts of introducing access charges. See Section 4 for more views on differential pricing.

Most submitters shared their personal experiences of access charging to support their submissions. Other types of evidence shared by submitters has been complied and summarised in Appendix 5.

3. Access charging – part of the solution?

The discussion document set out three options that the Government considered to address the issues outlined in the problem definition. These included introducing concessionaire-based access charges, voluntary access charges, or compulsory access charges. It also provided examples of how access charges have been used overseas, and that evidence suggests they could be a useful tool for New Zealand.

DOC asked:

#	Questions
3	a. Do you support the Government introducing the ability to charge for access to some parts of public conservation land? b. Why or why not? c. Could you share any evidence or data that has informed your opinion?
4	Are there any international examples available that you think the Government could learn from?
5	Do you agree with the assessment of voluntary and concessionaire-based access charges?

What DOC heard from consultation:

Question 3a, b and c. Do you support the Government introducing the ability to charge for access to some parts of public conservation land? Why or why not? And could you share any evidence or data that has informed your opinion?

Quantitative assessment of submitters' views

Overall statistics based on online survey responses and 'unique' submissions show that:

- 63 percent of submitters opposed or strongly opposed the Government introducing the ability to charge for access to some parts of PCL
- 30 percent of submitters supported or strongly supported the Government introducing the ability to charge for access to some parts of PCL
- 8 percent of submitters were neutral or unsure.

Support varied between online survey submissions and 'unique' submitters, see Table 4.

Table 44: Statistics on submissions responding to Q3a

Online survey responses to Q3a *80% (1,889) of online survey submitters responded*					
Strongly support	Support	Oppose	Strongly oppose	Neutral	Unsure
11% (211)	16% (308)	10% (190)	54% (1,027)	7% (132)	1% (21)
27% (519)		64% (1,217)		8% (153)	
'Unique' submissions on Q3a *175 (74%) of 'unique' submissions could be quantified - the rest were unclear or silent*					
Supports		Opposes		Neutral / Unsure	
51% (90)		42% (74)		6% (11)	

Qualitative assessment of submitters' views

The majority of submitters opposed charging for access to some parts of PCL

Many of these submitters considered that:

- free access to PCL is a basic right of New Zealanders and is incompatible with access charging
- New Zealanders already contribute to access charging via taxes and should not be asked to pay more
- access charges will create a financial barrier and will disproportionately affect poorer communities
- access is important for people's connections to nature, their health and education, and for environmental protection.

Some submitters were concerned about the viability of implementing access charging, and the risk of unintended consequences like the potential to negatively impact the tourism industry by reducing demand.

Others worried that enabling access charging in a narrow set of circumstances could 'open the floodgates' to more widespread access charging that they would not support.

Some submitters said that the existing charging structures for facilities (e.g. for hut fees, etc.) is flawed and does not justify introducing more charges.

A third of submitters supported charging for access to some parts of PCL

The most common reasons given for supporting access charging was enabling visitors to contribute to the upkeep of places they visit and enabling the ongoing protection of PCL.

Some submitters also said that access charging:

- would be a useful part of the conservation management toolkit
- aligns with international practice
- would enable management costs to be shared more fairly between visitors, and between visitors and taxpayers.

Most of these submitters' support was conditional on the design of the access charge, for example only charging international visitors, or only charging where visitor numbers are unsustainable, or only charging for certain popular tourist areas. A high number of the submissions supporting access charges commented that access should remain free or at low cost for New Zealanders.

Recreation, hunting and fishing groups

Not-for-profit groups and clubs (which includes tramping clubs, hunting and fishing bodies and volunteer conservation groups) were split between supporting and opposing access charges, but with more in support. However, even those who supported charging for specific services, sites or facilities expressed concerns about the imposition of access charges on New Zealanders. For example, seeing free access as a "cornerstone of New Zealand's outdoor heritage" (New Zealand Deerstalkers Association).

Fiordland Tramping and Outdoor Recreation Club

"Members are generally supportive of the principle of having to charge international visitors to access PCL, especially national parks. Currently, international visitors enjoy the benefits of our landscapes and nature without directly contributing to their upkeep."

New Zealand Deerstalkers Association (NZDA)

"Charging New Zealanders—hunters, taxpayers, and citizens—for access to PCL is a "thin end of the wedge" in the view of NZDA, threatening to price New Zealanders out of our heritage and erode our connection with our land. New Zealanders already contribute millions annually via taxes … and untold voluntary effort—additional fees are an affront, especially if imposed on recreational hunters."

Submitters also noted that access charging could put at risk the ongoing contribution by key user groups such as hunters, fishers, and trampers, who support conservation efforts through predator control and habitat monitoring. These groups already pay through hunting and fishing permits, hut and campsite fees, as well as saving DOC money on game management and pest

Federated Mountain Clubs (FMC)

"New Zealanders have a statutory right to visit public conservation land. There appears to be a fixation on treating public conservation land as a resource from which economic rents should be extracted, instead of looking at conservation land as a national taonga, which provides a wide range of ecosystem services, to be protected and nurtured for its own inherent value."

management activities. Further fees could discourage future contributions by these groups.

Conservation boards and environmental groups

Conservation groups were also split between support and opposition for access charging, but with more in support. Many noted the need to address the funding gap for conservation and the usefulness of the additional funding to better protect conservation values (e.g. improving biodiversity) as well as supporting management of visitor facilities, and track and infrastructure maintenance.

Environmental Defence Society (EDS)

"EDS broadly supports providing DOC with the ability to charge for access to some parts of PCL. This is an important and currently missing piece of DOC's management toolkit.

Provision for access charging aligns with international practice, and ensures visitors contribute to the care and maintenance of the places they visit…"

Some submitters (who either supported or opposed) were also concerned about the feasibility and practicalities of introducing an access charge. There were concerns around introducing infrastructure to collect fees, finding suitable sites with limited entrance/exits, and potential problems with compliance and enforcement – especially when dealing with international visitors.

The primary issue for opposing the introduction of access charging was that it was at odds with the fundamental expectation of New Zealanders to be able to freely access conservation lands. There was concern the charges would create a price barrier (particularly for families and young people) and that limiting access to natural environments would negatively impact on people's wellbeing and support for nature and conservation.

Conservation groups also noted that DOC's work is supported by a large number of volunteers who undertake pest management, weed removal, native species rehabilitation, hut and track maintenance. The introduction of charges may undermine voluntary contributions in the future.

Tourism stakeholders

Submissions from tourism industry stakeholders were generally supportive of the proposal to charge for access, with a preference for charging to be limited to a small number of locations and a focus on international visitors (rather than charging New Zealanders).

The advantages of charging were seen as better alignment with international practice, as well as providing the funding to ensure better facilities and experiences for visitors. However, some tourism stakeholders were concerned about the cumulative impact on visitors and the effect on tourism – the impact of a new access charge on top of the IVL and existing fees that visitors are already paying for concessionaires services.

A number of submitters raised the practical considerations for implementing an access charge, including how a charge would work, where it would be collected, how it would be administered and how DOC would monitor and enforce the charge.

Iwi, Hapū and Māori groups

There were mixed views in the submissions from Iwi, Hapū and Māori groups – with an equal split between support and opposition.

Access charging was seen as an opportunity to address the funding gap and another source of funding to support conservation operations and upkeep of facilities, but for only some parts of PCL. Support was predicated on a charging framework that ensured continuation of Iwi and Hapū rights and cultural responsibilities to care for their taonga, exercise tikanga, and uphold cultural practices and connections to land and water.

Raukawa Settlement Trust

"....access to PCL is not merely recreational but also holds deep cultural and spiritual significance. Charging iwi for access to the land will undermine these sacred connections and create barriers to fulfilling our obligations as kaitiaki, impacting our cultural well-being."

See Section 4 for further views from Iwi, Hapū and Māori groups on who should be charged or not.

An equal number of submissions opposed the introduction of access charging. The primary concern was impact on upholding rights through the Treaty of Waitangi and Treaty settlements, including:

- the ability to exercise rights within their rohe
- Settlement redress and mechanisms
- ability to practice responsibilities as kaitiaki
- unrestricted access to specific sites for rituals, gatherings, resource management
- the ability to practice mana whakahaere.

There was also concern that access charging will commodify spaces that hold spiritual, historical and ecological significance to Māori. For example, shifting "the narrative from preservation and protection to commercialisation" in a way that undermines the original intent of the formation of the Tongariro National Park (Tūwharetoa Māori Trust Board).

Question 4. Are there any international examples available that you think the Government could learn from?

There were 466 submitters that responded with commentary and information about international examples the Government could learn from, including international access charges and funding approaches.

Many submitters provided commentary on their personal experiences of the visitor fees for various national parks in the United States of America, Canada, Australia and Iceland. There was a wide variety of other examples of visitor charges provided in the submissions – ranging from the National Trust in the United Kingdom, through to the Galapagos Islands, Costa Rica, Peru, Chile as well as attractions and parks in Vietnam, Cambodia, Bhutan, Kenya and Japan.

A number of submitters noted that insufficient attention had been given to alternative funding mechanisms used internationally to support conservation programmes. For example, renewable energy companies contributing a percentage of profits to conservation, a corporate environmental responsibility tax on large businesses operating near protected areas, or a national carbon tax. Submitters also noted supplementary approaches to generating revenue at specific parks, such as a requirement to hire certified guides or tour operators as a way of generating additional revenue from visitors.

More detail on international examples can be found in Appendix 5.

Question 5. Do you agree with the assessment of voluntary or concessionaire-based access charging?

Statistics based on online survey responses indicate that most submitters disagreed with the discussion document's assessment of voluntary or concessionaire-based access charging (see Table 5). 'Unique' submitters talked about a range of issues, but their views could not be summarised quantitatively.

Table 5: Statistics on submissions responding to Q5

Online survey responses to Q5 *76% (1,766) of online survey submitters responded*					
Strongly agree	Agree	Disagree	Strongly disagree	Neutral	Unsure
5% (80)	15% (265)	16% (285)	30% (521)	22% (388)	13% (227)
20% (345)		46% (806)		35% (615)	

Submitters noted that while concessionaire-based charges and voluntary access payments are both useful tools, they are unlikely to be sufficient in all situations.

There was also a view that voluntary payments could be more widely utilised. For example, a voluntary payments system (such as an online platform) could

encourage more donations. However, many also noted that donations from visitors are not an effective or reliable way to raise funding.

Some submitters suggested compulsory access charges for international visitors, and voluntary access charges for New Zealanders. Many submitters supported fees for services, facilities and infrastructure, but not for general access into conservation land.

Some submitters proposed that concessionaire-based charges should be increased, and non-compliance better enforced. However, a few argued they should not increase/not exist.

See Section 9 for more feedback on how concession fees interact with access charges.

Interested Individual

"Any and all commercial activities should be paying for access. This is meant to be the case, but the lack of enforcement means this is being widely abused."

Many submitters proposed alternative options for generating revenue

Many submitters suggested more central government funding as an alternative way to close the funding gap. Another popular proposal was to more widely deploy car parking charges or road tolls in conservation areas. Some also supported increased charges to other facilities, such as increasing hut charges.

Many others thought that revenue could come from increased concession fees or increasing the fee for businesses who run activities on PCL. Many submitters also proposed that any party that profits from PCL or had commercial interests should have to pay a fee, or a bigger fee than they already do, including tour operators, commercial tourism, tour guides, as well as overseas filmmakers or commercial film companies.

Some submitters also suggested that international visitors coming for trophy hunting or fishing activities should be paying more than they are currently being charged.

Many submitters supported using the IVL as an access charge

This included expanding the IVL to include Australians and people from many Pacific Island countries and allocating a greater proportion of IVL funds to conservation. Others believed that the IVL should be increased, and some felt that the proportion of the IVL going to DOC should be higher than 50%.

Increasing IVL funding was seen as the easiest way to address the funding gap and administratively simpler than introducing access charges to a site or location. However, a few submitters were concerned that international visitors already pay significant fees through the IVL and increasing it further may deter them from visiting New Zealand.

4. Who should pay an access charge?

The discussion document set out three different potential approaches for who could be charged for access, including charging all visitors the same, charging everyone but charging New Zealanders less than international visitors, and charging only international visitors. This affects how much funding is collected, how a charge is implemented, and the effect of the charge on wider objectives, such as supporting access to the outdoors.

DOC asked:

#	Questions
6	To what extent do you support: Option A: Charging everyone Option B: Charging everyone but charging New Zealanders less than international visitors Option C: Charging only international visitors
7	a. Is there anything else the Government should consider when thinking about who should pay an access charge? b. Are there any other groups the Government should consider charging for access to some public conservation land?

What DOC heard from consultation:

Question 6. To what extent do you support Options A, B or C?

Quantitative assessment of submitters' views

Overall statistics based on online survey responses and 'unique' submissions show that:

- 86 percent of submitters opposed or strongly opposed charging everyone
- 77 percent of submitters opposed or strongly opposed charging everyone but charging New Zealanders less than international visitors[5]
- 72 percent of submitters supported or strongly supported charging international visitors.

Support between online survey submissions and 'unique' submitters was relatively similar, except for Option B, where their views were more varied. See Table 6 below.

Forest & Bird form submitters (4,826 submissions) commented on the importance of keeping people connected to nature. They said that "any charge for

[5] Note that many submitters used 'New Zealanders,' 'citizens,' and 'residents' interchangeably.

access to public conservation land should not deter New Zealanders from connecting with the natural environment of Aotearoa." This could mean that access charges should not create a price barrier for New Zealanders, or it could mean that New Zealanders should not be charged for access to some parts of PCL. See Appendix 3 for the full form submission.

Table 6: Statistics on submissions responding to Q6, Options A, B and C

Option	Type of submission	Supports		Opposes		Neutral/Unsure	
		Strongly support	Support	Oppose	Strongly oppose	Neutral	Unsure
Option A: Charging everyone	**Online survey** *91% (2,133) submitters responded*	4% (79)	5% (111)	12% (252)	74% (1,579)	5% (98)	1% (14)
		9% (190)		86% (1,831)		6% (112)	
	'Unique' submissions *69% (164) able to be quantified*	13% (22)		82% (135)		4% (7)	
Option B: Charging everyone, but charging New Zealanders less than international visitors	**Online survey** *91% (2,124) submitters responded*	8% (164)	8% (174)	18% (382)	59% (1,263)	6% (127)	1% (14)
		16% (338)		77% (1,645)		7% (141)	
	'Unique' submissions *136 (57%) able to be quantified*	29% (39)		63% (86)		8% (11)	
Option C: Charging only international visitors	**Online survey** *91% (2,121) submitters responded*	49% (1,048)	22% (468)	7% (155)	9% (193)	12% (245)	1% (12)
		71% (1,516)		16% (348)		13% (257)	
	'Unique' submissions *60% (143) able to be quantified*	76% (108)		14% (20)		10% (15)	

Qualitative assessment of submitters' views

Submitters raised many different reasons in support and opposition to the different charging options raised in the discussion document. These are summarised in Table 7.

Table 7: Qualitative assessment of submitters' views

Option	Supports	Opposes
Option A: Charging everyone	Of the submitters who supported this option: • many said that charging everyone would keep the system simple to implement and transparent • many said their support was conditional on there being reasonable charges, with appropriate exemptions, e.g. for youth • a few submitters were concerned about charging based on nationality or race and thought charging everyone would be fairer • some said that charging everyone would yield the best results in revenue for conservation • some expressed conditional support for charging New Zealanders depending on the location, e.g. for Great Walks.	Of the submitters who opposed this option: • most argued New Zealanders already contribute via taxes, so they should not be charged, and that free access is a basic right for citizens • many said that charging everyone would lead to inequitable outcomes • some felt that choosing not to charge New Zealanders was the right way to ensure that mana whenua are not charged for accessing PCL within their rohe, while also avoiding complexity associated with providing exemptions for mana whenua.
Option B: Charging everyone, but charging New Zealanders less than international visitors	Of the submitters who supported this option: • most said international visitors should pay more than New Zealanders because they have a bigger impact on PCL, and do not already contribute via tax to the same extent as New Zealanders • a few noted that differential pricing is commonly used (e.g. for the Great Walks) and is not difficult to implement.	Of the submitters who opposed this option: • some were concerned that differential pricing would not be cost effective to implement • some said that even a reduced charge will create a barrier to some New Zealanders accessing PCL.

Option	Supports	Opposes
Option C: Charging only international visitors	Of the submitters who support this option: • many noted that international tourists do not contribute to taxes, conservation work or maintaining PCL and therefore should pay • some suggested that international tourists are financially better placed to pay charges and would be happy to comply, especially since charging for access is commonplace overseas • many submitters noted that pressure on PCL infrastructure is usually caused by the high number of international tourists and charging internationals could be a way to control unsustainable pressure on PCL • some suggested that tourism is resistant enough to price changes, so that charging will not deter tourist numbers • some said that charging international visitors could be more cost-effective to implement, e.g. by charging them at the border upon entry.	Of the submitters who oppose this option: • many said that internationals already pay towards the upkeep of conservation areas through the IVL • some are concerned that increased costs/fees may decrease visitor demand by deterring international tourists from visiting PCL, noting that New Zealand is already an expensive place to visit. They were also concerned that a decrease in visitor demand may result in a loss of income to businesses and tourism • many said identifying international visitors versus domestic visitors would be challenging to implement.

Iwi, Hapū and Māori organisations

Most Iwi, Hapū and Māori organisations opposed charging everyone, and/or charging everyone but with New Zealanders paying less (Options A and B). Most supported charging international visitors only. There was strong opposition to charging mana whenua to access PCL within their rohe. This is explained in more detail in Section 7.

Ngati Tahu-Ngati Whaoa Runanga Trust

"The Runanga does not support New Zealand private citizens being charged to access land within their home district as they also have a right to connect with the whenua."

Many submitters also opposed charging any New Zealander, not just Māori. These submissions noted that New Zealanders already pay taxes, but also their own important connections with the land.

Many expressed conditional support for charging international visitors, depending on how government works with Iwi and Hapū to protect their rights and interests, and the role for Iwi and Hapū in the design and implementation of any access charge. This is also explained in more detail in Section 7.

Hapū settlement trust

"There may be cases where these whānau are arriving in NZ on a tourist visa under a foreign passport, however their whakapapa maintains their connection to their ancestral lands."

Conservation boards and environmental groups

Most conservation groups opposed charging everyone. Many said that New Zealanders should be encouraged to get outdoors. These submissions noted that when people are enabled to connect with their environment, they are more likely to protect and volunteer for its conservation. There are also other co-benefits from connecting with nature, like supporting holistic health. However, the Wellington Conservation Board submitted that Option C is "unlikely to generate the revenue required by the broader conservation system."

The Environmental Defence Society supported Option B, in part because charging everyone the same (Option A) would "drive an overall lower fee that fails to capture the potential added value of international visitors." It also submitted that differential pricing could improve access for New Zealanders who would otherwise be crowded out by high volumes of international visitors.

Recreation, hunting and fishing groups

Most not-for-profits and clubs opposed charging everyone. A primary concern was pricing New Zealanders out of access to the outdoors, and how inequitable that would be. Hunting and fishing groups emphasised the importance of free access to many who use PCL to put food on the table. Recreating in the outdoors should remain a low-cost activity.

Many of these groups see free access to PCL as a right for New Zealanders that should not be changed.

Aotearoa Climbing Access Trust

"Freedom of access puts the 'public' in Public Conservation Land."

Several groups emphasised that charging conservation volunteers would be unfair.

A few submitters suggested international visitors hunting on PCL should pay a higher fee for hunting licenses as an additional way to generate revenue.

Tourism stakeholders

Tourism stakeholders were split between support and opposition to charging everyone, with more in support. Some who supported charging everyone said it bests aligns with the user pays principle. Support was sometimes conditional on there being exemptions, e.g. for youth.

Though some submitted that international visitors would be able and/or willing to pay, others submitted that it would be unfair on them, especially when they already contribute via mechanisms like the IVL.

Bus and Coach Association

"We think differentiated charging for international visitors would be a serious mistake. It doesn't feel right from a New Zealand cultural perspective, but more importantly economic studies show they already paying more than their fair share on the impact of their visits to New Zealand, even before the IVL was increased by 333% last year."*

*DOC correction: the IVL was increased by 186% (from $35 to $100), not 333%

A few others expressed concern about the potential impact of the system on international visitor experience, depending on its design.

New Zealand Māori Tourism (NZMT)

"A system that is overly complex, does not enhance visitor experience, and might unintentionally make manuhiri feel exploited, would not be supported by NZMT."

Others supported charging international visitors as a viable way to reduce the funding gap, and as an opportunity to improve the visitor experience.

Question 7a. Is there anything else the Government should consider when thinking about who should pay an access charge?

Many submitters commented on exemptions and discounts

An *exemption* means an entry charge will not apply and a *discount* means a reduction from the specified charge (variable rates of discounts can be provided for different groups or activities). However, submitters tended to use these two terms interchangeably.

Of the submitters who commented on exemptions/discounts, many wanted exemptions for children, youth, or students to encourage them to interact with nature and learn about conservation. Some also felt that organisations involved in school groups or trips, or any educational activities should be exempt.

Many submitters (of these, mostly hunters) said that hunters should be exempt from access charges. Some recognised the importance of free access to those hunters who hunt for subsistence and to feed their families. Others said that

hunters provide a pest control service and charging them would result in higher numbers of pests for DOC to manage and negative biodiversity outcomes.

Many submitters said that volunteers, voluntary organisations or NGOs that contribute to conservation work should be exempt from access charges to encourage their work, and because they are unlikely to have much negative impact on PCL.

Some submitters supported exemptions for those with community service cards or gold card holders. This also extended to those with lower incomes and those with larger families.

A few submitters thought that locals should receive exemptions. Most submitters supported exemptions for mana whenua, for reasons including:

- to properly honour Te Tiriti o Waitangi
- to allow mana whenua to exercise kaitiakitanga or their kaitiaki roles
- to allow mana whenua free access to and within their rohe and to avoid creating a barrier to access ancestral lands/sacred lands/whakapapa.

Some submitters felt that exemptions for tangata whenua would create political tension and unintended division. Choosing not to charge New Zealanders was commonly suggested as a way to avoid this issue and to ensure that mana whenua are not charged for access to PCL in their rohe.

Of the submitters who commented on discounts, most suggested that low-income households, children and youth, and conservation volunteers should receive discounts. Many also suggested that students, education groups, community service card holders, locals, and recreational hunters should receive discounts.

Senior citizens, disabled people, and outdoor club members (e.g. climbers and mountaineers) were also suggested as groups of people who should be eligible for discounts.

Question 7b. Are there any other groups the Government should consider charging for access to some public conservation land?

Many submitters specifically supported charging those who are performing high-impact recreational activities such as motorbike racing, cycle tours and four-wheel drive events. Freedom campers, backpackers and campervans were also cited as groups who caused the most wear and tear to facilities on PCL, as well as those who walk the Te Araroa Trail.

Submitters identified other user groups that should be paying more than they currently do, though not necessarily via an access charge. See Section 9 for more detail.

5. Where should access charging be used?

The discussion document set out potential features of a site or location where access charges could be suitable. It noted that the Government does not consider access charging would be a practical or desirable tool for most PCL. It also highlighted that implementing a 'park pass' could be another approach to access charging.

The discussion document provided examples of places that have the features where access charging could be suitable, including Mautohe / Cathedral Cove, Tongariro Alpine Crossing, Kā Roimata o Hine Hukatere / Franz Josef Glacier, Piopiotahi / Milford Sound, and Aoraki / Mount Cook.

DOC asked:

#	Questions
8	a. Do you agree that the use of access charges should be limited to some areas of public conservation land? b. If you strongly agree or disagree, where should these places be?
9	a. We have identified the types of locations where access charges could be effective, which may include one or more of the following: • Places facing unsustainable pressure from visitors • Places popular with international visitors • Places with high biodiversity and scenic values • Places where user groups are defined Do you agree with the features identified for where access charging could be used? b. Are there any additional features we should consider?
10	Are there any features of a place that would mean access charging should not be introduced there?
11	To what extent do you support the 'parks pass' approach?

What DOC heard from consultation:

Question 8a. Do you agree that the use of access charges should be limited to some areas of public conservation land?

Quantitative assessment of submitters' views

Overall statistics based on online survey responses and 'unique' submissions show that:

- 52 percent of submitters agreed or strongly agreed that access charges should be limited to some areas of PCL
- 35 percent of submitters disagreed or strongly disagreed that access charges should be limited to some areas of PCL
- 13 percent of submitters were neutral or unsure.

Support varied between online survey submissions and 'unique' submitters. See Table 8 below.

Table 8: Statistics on submissions responding to Q8a

Online survey responses to Q8a *71% (1,656) of online survey submitters responded*					
Strongly agree	Agree	Disagree	Strongly disagree	Neutral	Unsure
22% (359)	29% (476)	10% (169)	26% (427)	11% (190)	2% (35)
51% (835)		36% (596)		13% (225)	
'Unique' submissions on Q8a *34% (81) of 'unique' submissions could be quantified – the rest were unclear or silent*					
Agrees		Disagrees		Neutral or Unsure	
80% (65)		12% (10)		7% (6)	

Qualitative assessment of submitters' views

Of the submitters who thought that access charges should be limited to some areas of PCL, many referenced the benefits of implementing an access charge vary across PCL. Some areas would benefit from an access charge more than others (e.g. areas with a lot of visitors). Some submitters supported limiting access charges to National Parks.

Some of the submitters who disagreed that access charges should be limited to some areas of PCL were concerned that localised access charging would displace visitor impacts onto neighbouring sites.

It was suggested that there should be a charge to access any PCL, but that the more popular sites could be priced higher than less popular sites.

Others supported charging for access everywhere on PCL, but only for international visitors. Some submitters suggested that this option should be 'enabled', but not necessarily implemented.

Question 8b. If you strongly agree or disagree, where should these places be?

Answers to this question overlapped with responses to Question 9a of the discussion document (see further detail below).

Most submitters who answered this question suggested areas where there are high volumes of visitors because those places need the most maintenance and environmental protection. In particular, places where visitors are creating large costs, and/or where there are many visitor facilities (e.g. toilet facilities and bike trails). The most mentioned locations included: Tongariro Alpine Crossing, Aoraki / Mt Cook, Piopiotahi / Milford Sound, and in general, the Great Walks (in the context of international visitors).

Other specific locations that were commonly mentioned include: Heaphy Track, Hooker Valley Track, Mueller Hut Track, Whitehorse Hill Carpark, Routeburn Track, Cathedral Cove, Franz Josef and Fox Glaciers, Fiordland walks, Te Araroa Trail, Abel Tasman National Park, Pancake Rocks at Punakaiki.

Question 9a. Do you agree with the features identified for where access charging could be used?

The discussion document suggested types of places where access charges could be effective, including one or more of the following features:

- places facing unsustainable pressure from visitors
- places popular with international visitors
- places with high biodiversity and scenic values
- places where user groups are defined.

Quantitative assessment of submitters' views

Statistics based on responses to the online survey show a relatively close split between submitters who agreed and disagreed with the features identified for where access charging could be used (see Table 9). 'Unique' submitters talked about a range of issues, but their views could not be summarised quantitatively.

Table 9: Statistics on submissions responding to Q9a

Online survey responses to Q9a *68% (1,582) of online survey submitters responded*					
Strongly agree	Agree	Disagree	Strongly disagree	Neutral	Unsure
11% (171)	30% (471)	12% (183)	24% (377)	18% (283)	6% (97)
41% (642)		36% (560)		24% (380)	

Qualitative assessment of submitters' views

Most submitters who agreed with the criterion '*places facing unsustainable pressure from visitors*' said that where visitor demand exceeds resources available for maintenance and biodiversity protection, charging could alleviate high maintenance and/or infrastructure costs. Some submitters also commented on the opportunity to use charging to manage visitor demand (see Section 9 for more detail).

Many submitters agreed that '*places popular with international visitors'* would be suitable for access charging. This aligns with the popularity of charging international visitors as an option.

Many submitters who agreed with the criterion '*places with high biodiversity and scenic values*' said that charging could help reduce visitor impact on biodiversity hotspots. Many also said that '*scenic value'* was too subjective, and preferred other criteria like '*visitor demand*' because it is more concrete.

Most submitters who agreed with the criterion '*places where user groups are defined*' said that Te Araroa Trail users should pay more to maintain the facilities and trails they use. On the other hand, a few said that Te Araroa Trail users should not have to pay more than they already do. A few submitters said Great Walks would be suitable for access charging, because the current facility fees do not cover costs.

Many submitters indicated that the discussion document did not make it clear enough how the criteria would be used to identify sites for access charging.

Question 9b. Are there any additional features we should consider?

Of the submitters who responded to this question, most said that access charging should only be considered in areas where it can be implemented cost-effectively. Many said that charges must remain justifiable and be implemented only where there is a need, e.g. to pay for regular maintenance.

A few individuals suggested charges should be limited to iconic destinations or destinations of national importance.

Many submitters said that support for access charging from mana whenua and local communities is an essential criterion the Government should consider. Further, some said that any access charges should align with the aspirations of local Iwi and Hapū, and stakeholders, as well as with strategic planning, e.g. regional destination management plans.

A few submitters, in particular Iwi, suggested considering places with high cultural or spiritual value. This also came up during regional hui. Access charges would be a way to reduce demand and manage excessive numbers at these locations.

Question 10. Are there any features of a place that would mean access charging should not be introduced there?

Of the submitters who commented on this question, most said access charges should not be used in:

- places of great cultural significance to mana whenua and tangata whenua (e.g. wāhi tapu, urupā, places of kaitiakitanga, or cultural ritual)
- backcountry and open hunting areas, and areas with little to no visitor infrastructure
- inaccessible, remote, or low-use areas
- high biodiversity areas where charges might encourage harmful displacement to more ecologically sensitive areas
- areas where the majority of visitors are New Zealanders or locals
- areas with high educational value.

Some submitters also said that access charges should not be used in:

- areas closer to large cities, because they are the easiest to reach and play an important role in ensuring equitable access to the widest range of visitors
- areas where there is high community involvement in conservation work, to encourage people to get involved
- short tracks and day walks in the 'front country,' where most of the visitors are locals
- locations that are disability-friendly, because charging would create another barrier for disabled people to access the outdoors.

Iwi and Hapū and Māori organisations

Most agreed that the use of access charging should be limited to some areas of PCL. However, a few submitters disagreed with the assertion that not all PCL would be suitable for access charging because all PCL could benefit from an access charge, if tailored to local circumstances.

Many said that if and where access charges are set, they must be determined with mana whenua on a case-by-case basis, so that none are introduced in places where they should not be used. For example, wāhi tapu, and other culturally significant places. See more on this in Section 7.

Recreation, hunting and fishing groups

Most agreed or strongly agreed that the use of access charges should be limited to some areas of PCL, and with the features identified for where access charging could be used. No notable themes were found across their submissions.

Conservation boards and environmental groups

The majority agreed or strongly agreed that the use of access charges should be limited to some areas of PCL. Of those who submitted via DOC's online survey, most also agreed with the features identified for where access charging could be used. Submitters provided a wide range of additional comments on where access charging could be used, or not. Beyond this, no notable themes were found across their submissions.

Tourism stakeholders

There was a strong expectation of further public consultation, including with tourism stakeholders, before any specific access charges are implemented.

Most agreed that the use of access charging should be limited to some areas of PCL. Places that had high volumes of visitors, especially international visitors, were commonly suggested. Of those that submitted via DOC's online survey, most also agreed with the features identified for where access charging could be used.

Some submitters said that an additional criterion should be considering what existing charges are in the area, e.g. through concessions or the Stewart Island Visitor Levy. Another criterion commonly suggested was the cost effectiveness of implementing an access charge in each place.

Tourism stakeholder

"Access charges should not be introduced in locations that rely heavily on tourism revenue, particularly remote regions where conservation areas are primary attractions for visitors. Additionally, locations where visitors are already paying through concession-based activities should not be subject to additional fees."

Question 11. To what extent do you support the 'parks pass' approach?

Quantitative assessment of submitters' views

Overall statistics based on online survey responses and 'unique' submissions show that:

- 32 percent of submitters supported or strongly supported a 'parks pass' approach
- 43 percent of submitters opposed or strongly opposed a 'parks pass' approach
- 25 percent of submitters were neutral or unsure.

Support varied between online survey submissions and 'unique' submitters (see Table 10 below).

Table 10: Statistics on submissions responding to Q11

Online survey responses to Q11 *67% (1,574) of online survey submitters responded*					
Strongly support	Support	Oppose	Strongly oppose	Neutral	Unsure
11% (174)	19% (299)	14% (214)	31% (490)	17% (266)	8% (131)
30% (473)		45% (704)		25% (397)	
'Unique' submissions on Q11 *30% (71) of 'unique' submissions could be quantified – the rest were unclear or silent*					
Supports		Opposes		Neutral/Unsure	
70% (50)		14% (10)		16% (11)	

Qualitative assessment of submitters' views

Most submitters who supported this approach said that it would be easier to implement than individual access charges, with lower administrative complexity and cost. Submitters noted that a parks pass would provide a stable revenue stream and that they are commonplace overseas.

Most submitters supported the approach only in the context of charging international visitors. A one-off border charge was preferred, and many submitters suggested using the IVL to do this.

A few submitters supported making parks passes available to New Zealanders, if it was more affordable than the charging system for international visitors.

Regional Tourism New Zealand (RTNZ)

"RTNZ believes the Government needs to carefully consider the cumulative effect of having multiple charges at any DOC destination visited. Consideration should be given to purchasable passes being made available for a period whether that is for multiple accesses to the DOC estate or for car parking or other services."

See Section 9 for more submissions on how access charges could interact with other existing charges.

Most submitters who did not support this approach said that the running costs would be too high. Submitters noted that what works for the United States of America would not work for New Zealand because of the difference in population and visitor numbers. Many said that DOC's Backcountry Hut Pass was already in place and acts as a *de facto* parks pass. Some said that park passes would not reflect actual usage of PCL, since not all parks have high visitation.

A few submitters were concerned that it would not be possible to provide enough transparency of government spending under a parks pass approach. Others anticipated a parks pass approach causing compliance issues.

6. How should the additional revenue be used?

The discussion document set out the estimated additional revenue that could be raised from access charging per year (between $36 and $70 million), and three approaches for where this revenue could be spent. This includes investing more of the money at the place it is collected in (e.g. within the park), or in the region it is collected in (e.g. Northern North Island, Western South Island), or on priority projects across New Zealand, regardless of where it is collected.

DOC asked:

#	Questions
12	To what extent do you support: Option A: More of the money should be invested at the place it is collected in Option B: More of the money should be invested within the region it is collected in Option C: Invest the money in priority projects across New Zealand, regardless of where it is collected If you have not already, please explain why this is your preferred approach or combination of approaches.
13	Are there any international approaches to spending money from access charging that you think the Government should consider?

What DOC heard from consultation:

Question 12. To what extent do you support Options A, B or C, and why?

Quantitative assessment of submitters' views

Overall statistics based on online survey responses and 'unique' submissions show that:

- 51 percent of submitters supported or strongly supported investing more of the money at the place it is collected in
- 51 percent of submitters supported or strongly supported investing more of the money within the region it is collected in
- 40 percent of submitters opposed or strongly opposed investing the money in priority projects across New Zealand, regardless of where it is collected.

Support varied between online survey submissions and 'unique' submitters. See Table 11 below for more detail.

Forest & Bird form submitters (4,836 submitters) commented on the importance of prioritising New Zealand's native plants and animals. They said that "charges should only be used as part of an overall government plan to deliver a net, sustained increase in investment in biodiversity and conservation." See Appendix 3 for the full form submission.

Table 11: Statistics on submissions responding to Q12, Options A, B and C

Option	Type of submission	Supports		Opposes		Neutral/Unsure	
		Strongly support	Support	Oppose	Strongly oppose	Neutral	Unsure
Option A: More of the money should be invested at the place it is collected in	**Online survey** *64% (1,496) submitters responded*	22% (330)	27% (410)	12% (184)	13% (197)	23% (343)	2% (32)
		49% (740)		25% (381)		25% (375)	
	'Unique' submissions *35% (83) able to be quantified*	76% (63)		19% (16)		5% (4)	
Option B: More of the money should be invested within the region it is collected in	**Online survey** *62% (1,457) submitters responded*	17% (246)	33% (474)	11% (162)	12% (177)	25% (357)	3% (41)
		50% (720)		23% (339)		28% (398)	
	'Unique' submissions *34% (81) able to be quantified*	72% (58)		21% (17)		7% (6)	
Option C: Invest the money in priority projects across New Zealand, regardless of where it is collected	**Online survey** *63% (1,473) submitters responded*	16% (236)	21% (305)	16% (228)	25% (371)	20% (298)	2% (35)
		37% (541)		41% (599)		22% (333)	
	'Unique' submissions *32% (75) able to be quantified*	52% (39)		33% (25)		15% (11)	

Qualitative assessment of submitters' views

Submitters raised many different reasons in support and opposition to the different options for how revenue should be used. These are summarised in Table 12.

Table 12: Qualitative assessment of submitters' views

Option	Supports	Opposes
Option A: More of the money should be invested at the place it is collected in	Of the submitters who supported this option: • many said it aligns best with 'user pays,' allowing visitors to see the tangible results of their contributions • many said they supported revenue being spent at place, but only for conservation purposes, not visitor assets.	Of the submitters opposed to this option: • most said it would disadvantage conservation areas with low visitor numbers • many said that spending money at place might not mean it is being spent on the highest conservation or biodiversity priorities • a few said it could restrict DOC's ability to use funds for other priorities • a few were concerned it could lead to over-investment and excessive visitor infrastructure.
Option B: More of the money should be invested within the region it is collected in	Of the submitters who supported this option: • many said that it would mitigate disproportionate over-investment in highly visited sites and ensure that nearby, less-visited sites benefit too • some saw it as a way to ensure flexibility of investment throughout the region, whilst maintaining transparency.	Of the submitters who opposed this option: • most said that it would disadvantage other conservation areas with high cultural values and low visitor numbers • some worried it might incentivise increasing visitor numbers in already overcrowded spaces • a few said it did not align well with the 'user pays' principle.

Option C: Invest the money in priority projects across New Zealand, regardless of where it is collected	Of the submitters who supported this option: • most said that it would be more equitable because there is an uneven distribution of PCL across the country, and an uneven distribution of visitor numbers • many said they wanted investment based on evidence-based, priority conservation projects, focusing on biodiversity.	Of the submitters who opposed this option: • most said it was less transparent and created disconnect between charges and services • some pointed out that national priority projects can draw on other sources of funding (e.g. the IVL).

Many submitters supported a combination of approaches

Many submitters supported reinvesting back at place to meet management and maintenance needs. Once investment needs at place are met, then many submitters supported reinvesting back into the region, or on priority projects nationally (or some combination).

Many submitters looked favourably on the United States of America model, where 80% of revenue is spent at place, and 20% goes to a national pot.

Submitters commented on what they thought the money should be used for, not just where it should be spent

Almost all submitters who commented on this topic said that revenue should be used for conservation and/or visitor purposes, not for any other government spending. Some submitters further clarified that revenue should be additional to the Crown funding that DOC receives and should not be used to justify further cuts to DOC.

Within that, many submitters said that revenue should be used for conservation and/or biodiversity purposes only – not for visitor-related purposes. Conversely, many said that revenue should be used for visitor infrastructure and other visitor-related costs only – not for conservation-related purposes. Others suggested a combination of these approaches, with varying ratios.

Some submitters said that revenue generated in their rohe should be used for Iwi-led initiatives – particularly if that revenue was generated from areas of cultural significance.

Some submitters said that revenue should be used to fund community organisations that do conservation work.

4,836 Forest & Bird Form Submitters

"Charges should only be used as part of an overall government plan to deliver a net, sustained increase in investment in biodiversity and conservation."

Submitters also commented on oversight, transparency and accountability needs

Many submitters made it clear that they thought that revenue allocation needs to be robust, objective, transparent, and provide value-for-money.

Many of the submitters who supported investing revenue back into the place it was collected from said revenue should be ringfenced for spending at the place it was collected, to ensure public trust.

Many submitters said they wanted evidence-based investment in priority conservation projects focusing on biodiversity. Of those, a few said that that environmental experts should decide on revenue allocation.

Iwi and Hapū and Māori organisations

Many supported Option A, or a combination of Option A and Option B.

> **Ngati Tahu-Ngati Whaoa Runanga Trust**
>
> *"If money gathered from each specific place were invested back into the place, the visitor experience would be enhanced and our precious taonga would be proactively protected, restored and enhanced. If there were a surplus of funds available for a specific place, or it could be demonstrated that another place within the region had a greater need, then funding could be redirected but DOC and mana whenua should make these decisions together based on factual evidence presented in a transparent and accountable way."*

Iwi, Hapū and Māori organisations were split between support and opposition for Option C. Some opposed Option C, as they felt it would be subsidising activities outside of their region, would not contribute towards a circular economy locally, and would be less transparent. Others expressed concern that pooling funding regionally or nationally could disconnect Iwi and Hapū from conservation revenue, limiting their ability to exercise kaitiakitanga in their rohe.

Rangitāne Tū Mai Rā Trust preferred a combination of Options A, B and C. Option C could be used to establish a national contingency fund "to enable DOC to respond to high priority management needs, including repairing damage following significant storm events."

Many submitted that revenue should be ringfenced for reinvestment back into te taiao in line with Iwi aspirations and priorities within the rohe. A portion of revenue should be invested in Iwi-led initiatives or allocated directly to Iwi. See Section 7 for further detail.

Recreation, hunting and fishing groups

There was an almost equal level of support, or strong support, across all three options amongst submitters. Many submitters expressed support for various combinations of approaches. Submitters were clear that revenue from access charging should be used for conservation (with a focus on visitor infrastructure), not for any other government spending. Transparent revenue allocation was a key theme in submissions from recreation, hunting and fishing groups.

Conservation boards and environmental groups

There was slightly more support for Option C - investing the money in priority projects across New Zealand, regardless of where it was collected from. Many submitters supported this option because they perceived New Zealand's biodiversity crisis as a national-level issue, justifying national-level prioritisation. Many also supported or strongly supported investing more of the money at the place it is collected in, within the region it was collected within, or a combination of approaches. Submitters were clear that revenue from access charging should be used for conservation with a focus on biodiversity, not just for visitor infrastructure.

Tourism stakeholders

There was most support for Option A, followed by Option B (or some combination of both). Support for Option C was more evenly split. Some saw Option A as more the most transparent option. This could mean greater social license for the introduction of an access charge, because visitors could know where the revenue is being invested.

Some saw Option B as an opportunity to support less popular sites that need further investment. One submitter said this was important to support alternative experiences for locals who want to get away from the tourist hotspots.

Submitters tended to have more emphasis on reinvesting revenue into improving visitor experiences.

Question 13. Are there any international approaches to spending money from access charging that you think the Government should consider?

Most submissions that referenced international examples focused on approaches to access charging or alternative revenue and funding models, rather than how revenue is spent. See Appendix 5.

7. Working with Iwi (and Hapū)

The discussion document highlighted that Iwi have responsibilities, rights and interests in conservation land, and that the Government has a duty to protect these rights and interests. Under the Conservation Act 1987, the Government's policies, planning and decision-making processes need to give effect to Treaty principles.

DOC asked:

#	Question
14	How can the Government best meet its Treaty obligations in designing and implementing access charging?

What DOC heard from consultation:

Question 14. How can the Government best meet its Treaty obligations in designing and implementing access charging?

DOC heard from 792 submitters on this topic (either in response to this question or in another part of their submission), including 35 Iwi, Hapū, or Māori organisations. 706 submissions came from interested individuals, 47 came from representative groups, and 4 were from 'other' submitters.

Submitter's answers to this question were highly varied. DOC was not able to do a detailed secondary analysis of how frequently various suggestions were made by submitters.

This section sets out overall feedback from all submitters, followed by specific and/or unique views of groups of submitters, including Iwi, Hapū and Māori organisations.

Many submitters focused on how the Government should best meet its Treaty obligations in the process of working on access charging, including by implementing a co-governance model with Iwi and Hapū at both national and local levels, whereby decisions are made in partnership with Iwi and Hapū. This includes involving Iwi and Hapū in decisions on how the funds are used.

Many submitted that a portion of access charging revenue should be directly allocated to Iwi and Hapū. Revenue could be re-invested in Iwi-led conservation projects or used to support mana whenua with their kaitiaki responsibilities. A few submitters supported the revenue sharing model used at Uluru-Kata Tjuta National Park in Australia, which was cited in the discussion document.

Many submitted on the importance of undertaking meaningful consultation with Iwi and Hapū, emphasising active collaboration.

Many other submitters focused on guardrails for the implementation of any future access charges, including that:

- mana whenua can freely connect with their ancestral lands
- access charges do not interfere with the right of mana whenua to perform customary tikanga, rights to mahinga kai, or to uphold their kaitiakitanga responsibilities
- existing Treaty settlements are not undermined by any access charging scheme
- DOC maintains transparency and accountability by reporting how revenue is used to Iwi and Hapū.

See Section 9 for submitters' comments on transparency and accountability to the public generally.

As well as the procedural obligations suggested by submitters (see above), submitters saw three broad ways for the Government to keep within these guardrails:

1. **Charge no one for access.** Many submitters said the easiest way to meet Treaty obligations would be to not implement access charging at all.

2. **Do not charge New Zealanders, only international visitors.** Some supported this option because they oppose any exemption to access charges based on ethnicity. Others supported this option because they did not want to see mana whenua charged for access and were concerned about the potential for an exemption for mana whenua to become politically divisive.

3. **Charge New Zealanders, but exempt mana whenua.** If New Zealanders are charged for access, then many submitters said that mana whenua should be exempt.

> **Interested Individuals**
>
> *"Do not charge any person for whom that place has a strong connection to. Be that Māori, Pakeha, or Pasifika. That may be tricky to define, hence my opposition to charging kiwis."*
>
> *"Any fees or charges should not be race based. They can be nationality based (i.e. New Zealander or 'international'). But all New Zealand's citizens need to be treated fairly and equally."*

Some other submitters said that the Government should work with Iwi and Hapū to determine how it can best meet its Treaty obligations, rather than asking the general public.

A number of other submitters felt the Government did not need to, or should not, give special consideration to meeting Treaty obligations when designing and

implementing access charging. Similarly, some submitters said there should not be any charging policies based on race or ethnicity.

A small minority of submitters (mostly interested individuals) expressed concern about Iwi-led conservation work potentially leading to poor conservation outcomes.

Iwi and Hapū and Māori organisations

Overall, the strong theme from Iwi, Hapū and other Māori organisations' submissions was that to meet its Treaty obligations, the Government must uphold Te Tiriti o Waitangi principles, respect the rights and responsibilities of Iwi and Hapū as kaitiaki, provide meaningful partnership in decision-making, and align with commitments set out in Treaty Settlement arrangements.

Many started by setting out the rights that could be impacted by access charging proposals. The customary right to access PCL for cultural practices was seen as guaranteed by the Treaty and requiring protection. There was also concern that any introduction of fees will disproportionately impact whānau, Hapū and Iwi (Rangitāne Tū Mai Rā Trust)

Raukawa Settlement Trust

"Iwi and hapū, including Raukawa, have longstanding customary rights to access PCL for practices like gathering kai (food), rongoā (medicinal plants), and performing spiritual or cultural activities at wāhi tapu (sacred sites). Charging for access would restrict or commercialize these practices, which are vital for our cultural identity and heritage."

There was unanimous opposition to charging mana whenua. To do so would be seen as a breach of the Treaty (particularly Article 2). An access charging system which restricted the ability of mana whenua to connect with whenua could be seen as effectively being another form of raupatu. Some submitters opposed charging tangata whenua for access to any part of PCL.

Te Rūnanga o Rangitāne o Wairau

"Access to te taiao is a fundamental right of tangata whenua, and the ability to exercise kaitiakitanga must be preserved. Any framework that restricts this right is a breach of Te Tiriti."

Submissions noted that any access charges must be developed and implemented in partnership with Iwi, by establishing robust and resourced co-governance and co-management mechanisms at a rohe level. It was key that Iwi are included in decisions on where, how and if charges apply, setting fees, exemptions, and revenue allocation and investment planning.

Another common submission was to allocate a portion of access charging revenue directly to Iwi to support Iwi-led conservation efforts and initiatives, and that without clear mechanisms for Iwi involvement, "the revenue system risks failing to meet Treaty obligations" (Raukawa Settlement Trust). Revenue could

also be used to support Iwi and Hapū in performing their kaitiakitanga responsibilities, e.g. by funding Iwi to actively engage in conservation management, and other roles set out in Treaty settlements. Many said that revenue should remain in the rohe it was collected within.

Some said that the Government should maintain transparency and accountability though clear reporting on revenue allocation. It was also suggested that regular reviews must also be built into any access charging framework to allowing Iwi and Hapū to assess whether the system is upholding The Treaty.

Recreation, hunting and fishing groups

Most representative bodies submitted on the importance of partnering with Iwi and Hapū, and that their rights and interests relating to PCL should be actively protected.

Some others spoke on the importance of shared, inclusive decision-making between the Government, Iwi and Hapū and key stakeholders.

New Zealand Deerstalkers Association

"Co-design with Iwi and recreational user group NGOs, including leading organisations like FMC and NZDA, via an inclusive forum, ensuring charges do not block cultural practices and historical access to public lands for tramping and hunting."

Recreation Aotearoa

"We strongly encourage DOC to uphold its Te Tiriti o Waitangi obligations and actively protect the rights and interests of iwi as they relate to public conservation land."

Conservation boards and environmental groups

Submissions from environmental groups strongly supported actively protecting Māori rights and interests, and working in partnership with Iwi and Hapū, including meaningful engagement.

Environmental Defence Society

"It will be important for the Government to work closely with mana whenua, to identify funding and investment priorities, and ensure access and connection to traditional sites and practices, and an ability to undertake their role as kaitiaki, is maintained."

Some conservation boards, as well as some environmental groups, such as the World Wide Fund for Nature New Zealand (WWF New Zealand), submitted that access should remain free to mana whenua. Many submitted that Iwi should be involved in decisions on revenue allocation, while others thought revenue should be directly allocated to Iwi.

> **Wellington Conservation Board**
>
> *"Any access charging regime should be delivered in partnership with Treaty partners. Mana whenua should not be subject to any charges to access conservation land. The Department of Conservation should work closely with mana whenua on the further development of these proposals, and ensure clear roles for them in the implementation. Revenue generated should also support mana whenua with their kaitiaki responsibilities."*

Tourism stakeholders

Most of the submitters who commented on this issue emphasised the importance of meaningfully consulting with Iwi.

Some submitters, like Regional Tourism New Zealand and RotoruaNZ, spoke of the importance of any access charging framework enabling mana whenua to fulfil their role as kaitiaki and engage in cultural practices on PCL.

> **RotoruaNZ** (Regional Tourism Organisation)
>
> *"Ensuring that tangata whenua have a central voice in decision-making will help to create a framework that respects cultural values, upholds Treaty obligations, and appropriately balances conservation efforts with economic and recreational considerations. We believe that Iwi should have the ability to determine how best to implement access charging in a way that aligns with their guardianship responsibilities and their aspirations for the whenua."*

A tourism stakeholder submitted that "a portion of any new revenue should be allocated to Iwi-led conservation and visitor experience projects."

8. Other design questions

The discussion document highlighted that groups like councils, not-for-profit organisations and Iwi also administer land with conservation values (e.g. reserves), and they incur similar costs to DOC. The ability to charge could be extended to these groups in certain circumstances. The discussion document also highlighted that further work will be required on how the charges interact with concession fees.

DOC asked:

#	Question
15	Some groups other than the Department of Conservation (DOC) manage land with conservation values. Do you think these groups should be allowed to charge people to access this land, if it meets certain characteristics in section 7, to help pay for upkeep and improvements?

What DOC heard from public consultation:

Question 15. Do you think groups other than DOC should be allowed to charge for access?

Quantitative assessment of submitters' views

Overall statistics based on online survey responses and 'unique' submissions show that:

- 60 percent of submitters disagreed or strongly disagreed that groups other than DOC should be allowed to charge for access
- 25 percent of submitters agreed or strongly agreed that groups other than DOC should be allowed to charge for access
- 15 percent of submitters were neutral or unsure.

Support varied between online survey submissions and 'unique' submitters, see Table 13.

Table 13: Statistics on submissions responding to Q15

Online survey responses to Q15 *52% (1,208) of online survey submitters responded*					
Strongly agree	Agree	Disagree	Strongly disagree	Neutral	Unsure
7% (87)	16% (198)	13% (152)	49% (592)	12% (143)	3% (36)
23% (285)		62% (744)		15% (179)	
'Unique' submissions on Q15 *21% (50) 'unique' submissions could be quantified – the rest were unclear or silent*					
Agrees		Disagrees		Neutral or Unsure	
54% (27)		18% (9)		28% (14)	

Qualitative assessment of submitters' views

Many submitters who did not support allowing groups other than DOC to charge for access said that it would be inappropriate for other groups to take on collection and enforcement roles. Many were concerned that other groups could set charges too high or might not be subject to necessary requirements for oversight, accountability and transparency. There was also concern that enabling many different groups to charge for access would create a complex and inconsistent system, with a risk of double-charging.

Additionally, some submitters said that only DOC staff should be collecting access charges – and that this role should not be contracted out to private groups.

> **Canterbury Aoraki Conservation Board**
>
> *"Any collection of fees and site administration of a charging scheme should be undertaken by DOC. It is extremely important the DOC staff are the face of welcoming visitors to these important sites and can answer questions about the sites and provide directions. It will be a sensitive task checking nationality, passes or collecting fees and it needs to be seen as an interaction with rangers not parking wardens. Enabling a commercial entity to manage the 'revenue collection' will mean that a portion of the revenue will disappear as company profits and that the company will have an incentive to lobby for more sites regardless of the consequences for conservation or public access."*

Some other submitters said that other groups managing land with conservation values should receive some revenue from access charges for their contributions to conservation. Others said there would be no need for other groups to collect and administer access charges if DOC can allocate revenue to them. See Section 6 for more submissions on how revenue should be used.

Of those who supported enabling other groups to charge for access, many said Iwi should be able to charge for access in their rohe. Many supported councils being able to use access charging because they provide carparks and other amenities in some locations.

Others said community trusts and NGOs should be able to charge to support their conservation work, since they do not directly benefit from taxpayer money or levies. The land managed by groups other than DOC comprises a relatively small amount of PCL, so visitors could choose not to pay and visit somewhere else instead.

Some submitters said that if other groups are enabled in this way, they should be audited to ensure revenue is being used appropriately.

Conservation boards and environmental groups

Some environmental groups supported enabling groups (other than DOC) to charge for access with proper safeguards to ensure transparency, especially given these groups are often filling gaps left by DOC due to lack of resource. The Environmental Defence Society specified that any charges imposed by other groups should be for the purposes of helping to pay for the upkeep and maintenance of those areas.

Hawkes Bay Conservation Board

"Public toilets and facility access (such as camping grounds or campsites, ablution blocks) in remote or coastal areas are difficult to maintain when costs are prohibitive and not included from a rate-payer base. Such groups manage local resources either by reactionary means of being informed by the public of a need, or via a local community or volunteer group. The opportunity to realize a revenue stream via localised access charges is a game-changer for most small, remote, rural and coastal communities."

Iwi and Hapū

There were mixed views in the submissions from Iwi, Hapū and Māori groups – with an equal split between support and opposition.

Some submitters expressed conditional support for enabling groups other than DOC to charge for access. For example, Te Rūnanga o Ngāti Mutunga, Te Kaahui o Rauru, Ngā Iwi o Taranaki and Te Rūnanga o Ngāti Ruanui would support such charges, but only for international visitors.

Te Rūnanga o Rangitāne o Wairau

"Iwi and hapū who have settled Treaty claims (such as Rangitāne) or who manage conservation land should have the flexibility to introduce their own access frameworks that reflect tikanga and local needs. This could include iwi-managed passes, targeted exemptions, or co-managed fee structures."

However, others did not support enabling third-parties to charge for access who are not part of existing co-governance or relationship agreements, like the agreement between the Minister of Conservation and Te Rūnanga Ngāti Whare Whirinaki for the co-governance of Te Pua a Tane Conservation Park.

9. Additional themes in submissions

Beyond identifying the following common themes, DOC did not undertake further analysis of how frequently various suggestions were made by submitters due to the volume of submissions and time available.

Demand management

Some submitters touched on the possibility of using access charging as a tool to manage demand in certain areas of PCL. Those that submitted in favour of this possibility said that it would reduce over-visitation. Less crowding would improve the visitor experience and help protect biodiversity from visitor impacts. Some submitters said that this should be done only when necessary (e.g. at peak times).

Those that submitted against using access charging to manage demand expressed concerns around the potential inequitable outcomes of restricting access so that only those who could afford it could experience PCL. Others were concerned about displacing demand to other neighbouring sites less prepared to accommodate high volumes of visitors, and the associated negative outcomes of doing so. Some submitters said there are better tools for demand management other than pricing (e.g. using a ballot system for access).

Determining pricing

Some submitters said that pricing should generally be based on the maintenance and delivery costs at place, or the standard of the facilities on offer. Others said the relative impacts of the visitor's activity should determine pricing. For example, an activity that has greater wear and tear on visitor infrastructure (e.g. four-wheel drive on tracks) should carry a higher cost than a visitor walking off-track in the back country. Some submitters suggested options for differential charging to allow for seasonal variations (e.g. peak and off-peak periods).

Compliance

Most of the submitters who commented on this topic thought the implementation costs (including compliance costs) might outweigh potential revenue.

Submitters expressed concern about the difficulty of enforcing access charges given the size of the conservation estate and limited DOC capacity and powers. Many pointed out there is already significant non-compliance for charges set by DOC (e.g. hut passes).

For this reason, some said that charging international visitors could be more cost-effective to implement (i.e. by charging them at the border upon entry). A few submitters said this could be attached to existing charges like the IVL, or international visitors could be offered a Parks Pass at the border.

Some expressed safety concerns associated with compliance. A few submitters worried that tasking DOC staff with compliance activities could compromise their safety. A few other submitters said that taking compliance measures could result in visitors behaving unsafely to avoid payments (e.g. by starting and leaving in the dark).

Some submitters said they would not appreciate having to carry around extra identification to prove they are a New Zealander to avoid being charged as an international visitor.

Interactions with existing charges

Most submitters who commented on the topic of interactions with other charges said that concessionaires should not be double charged for access, on top of their concession fees.

Game Animal Council

"Clients of hunting guides, helicopter companies and other concession holders already effectively pay for access and use of PCL through concession fees. The GAC questions whether it would be fair to effectively charge these people twice for the same access."

Some suggested combining charges. For example, a concessionaire fee could be combined with an access charge to avoid multiple payments.

RotoruaNZ (regional tourism organisation) supported the "creation of an overarching funding strategy for visitors to avoid a disjointed system with an incoherent funding approach". It noted that any access charge should be considered in conjunction with existing funding mechanisms (e.g. IVL, carparking, airport taxes, border charges and existing voluntary and concessionaire-based access charges). This would avoid potential double-charging, negative visitor experiences, or changes to visitor numbers.

Some submitters emphasised the importance of market research before introducing new charges because they were concerned about the cumulative impact of multiple charges on demand for tourism and the competitiveness of New Zealand as a visitor destination.

Tourism Industry Aotearoa (TIA)

"It is critical that the total cumulative cost incurred by visitors across the funding environment is considered before any new charges are established."

Other existing charges raised by submitters for consideration include the IVL, concessionaire fees and facility fees (e.g. hut fees).

Interactions with existing legislation

A few submitters made specific comments about how charging for access to some areas of PCL would interact with other existing legislation, beyond what was covered in the discussion document.

For example, Herenga ā Nuku Aotearoa, the Outdoor Access Commission, submitted that any form of access charging on PCL would be contrary to the Walking Access Act 2008 and its principles. The purpose of the Act is to provide the New Zealand public with free, certain, enduring, and practical walking access to the outdoors. If 'free' was to be interpreted differently, Herenga ā Nuku Aotearoa submit that: "…then the test for charging New Zealand residents for access should be whether it restrains or limits their ability to access public conservation land".

System oversight and safeguards

A few submitters commented on the topic of the oversight of any future access charging. Some submitters said transparency is needed to ensure that any revenue generated through access charges is used for its intended purpose and is not mismanaged.

A few submitters said that there should be legislative safeguards so that if the Government seeks to expand where access charges are used, who is charged or to change pricing, there should be further public consultation.

Interested individual

"Without strong regulatory safeguards, there is a risk of a gradual expansion of fees that could limit access and disproportionately affect some groups."

4,836 Forest & Bird form submitters commented on the importance of maintaining robust checks and balances. They said that "Aotearoa needs evidence-based conservation policy with independent oversight, it's important that we don't have ministerial overreach or poorly informed national policy changes." Additionally, they spoke on the importance of letting people have their say. They said, "It's important to keep public participation in conservation policy development – having a range of voices means key issues are addressed, and significant policy changes are only proposed when truly necessary." See Appendix 3 for the full form submission.

Appendix 1: Online survey questions

Name	
Organisation (if applicable)	
Contact details	
Please tell us what kind of submitter you are.	☐ Interested individual ☐ Local government (or related entity) ☐ Conservation group ☐ Tourism business ☐ Iwi, hapū or Māori organization ☐ Not-for-profit or club ☐ Industry association ☐ Other

Release of information

Please let us know if you would like any part of your submission to be kept confidential.

☐ I would like to be contacted before the release or use of my submission in the summary of submissions that will be published by DOC after the consultation.

☐ I would like my name, or any other personal information, to be kept confidential in any summary of submissions or external disclosures.

☐ I would like my submission (or identified parts of my submission) to be kept confidential, and have stated below my reasons and grounds under the Official Information Act that I believe apply, for consideration by DOC.

I would like my submission (or identified parts of my submission) to be kept confidential because [Insert text] My reasons and the grounds under the Official Information Act that I believe apply are [Insert text]

Responses to questions

Part 3 – Issues	
1.	Do you agree with the issues and how they have been presented? ☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ Unsure Add any comments below.
2.	a. Have any issues been missed? ☐ Yes ☐ No ☐ Unsure ☐ No comment Add any comments below.
	b. Do you have any examples or data that demonstrate your view on the issues?
Part 4 – Access charging – part of the solution?	
3.	a. Do you support the Government introducing the ability to charge for access to some parts of public conservation land? ☐ Strongly support ☐ Support ☐ Neutral ☐ Oppose ☐ Strongly oppose ☐ Unsure b. Why or why not?
	c. Could you share any evidence or data that has informed your opinion?
4.	Are there any international examples available that you think the Government could learn from? ☐ Yes ☐ No ☐ Unsure ☐ No comment Add any comments below.

5.	Do you agree with the assessment of voluntary and concessionaire-based access charges? ☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ Unsure Add any comments below.

Part 5 – Who should pay an access charge?

6.	To what extent do you support: a. Option A: Charging everyone ☐ Strongly support ☐ Support ☐ Neutral ☐ Oppose ☐ Strongly oppose ☐ Unsure Add any comments below.
	b. Option B: Charging everyone but charging New Zealanders less than international visitors ☐ Strongly support ☐ Support ☐ Neutral ☐ Oppose ☐ Strongly oppose ☐ Unsure Add any comments below.
	c. Option C: Charging only international visitors ☐ Strongly support ☐ Support ☐ Neutral ☐ Oppose ☐ Strongly oppose ☐ Unsure Add any comments below.

7.	a. Is there anything else the Government should consider when thinking about who should pay an access charge? ☐ Yes ☐ No ☐ Unsure ☐ No comment Add any comments below.
	b. Are there any other groups the Government should consider charging for access to some public conservation land? ☐ Yes ☐ No ☐ Unsure ☐ No comment Add any comments below.

Part 6 – Where should access charges be used?

8.	a. Do you agree that the use of access charges should be limited to some areas of public conservation land? ☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ Unsure Add any comments below.
	b. If you strongly agree or agree, where should these places be?
9.	a. We have identified the types of places where access charges could be effective, which may include one or more of the following features: • Places facing unsustainable pressure from visitors • Places popular with international visitors • Places with high biodiversity and scenic values • Places where user groups are defined Do you agree with the features identified for where access charging could be used? ☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ Unsure

	Add any comments below.
	b. Are there any additional features we should consider? ☐ Yes ☐ No ☐ Unsure ☐ No comment Add any comments below.
10.	Are there any features of a place that would mean access charging should not be introduced there? ☐ Yes ☐ No ☐ Unsure ☐ No comment Add any comments below.
11.	To what extent do you support the 'parks pass' approach? ☐ Strongly support ☐ Support ☐ Neutral ☐ Oppose ☐ Strongly oppose ☐ Unsure Add any comments below.

Part 7 – How should the additional revenue be used?

12.	To what extent do you support: a. Option A: More of the money should be invested at the place it is collected in ☐ Strongly support ☐ Support ☐ Neutral ☐ Oppose ☐ Strongly oppose ☐ Unsure Add any comments below.
	b. Option B: More of the money should be invested within the region it is collected in

	☐ Strongly support ☐ Support ☐ Neutral ☐ Oppose ☐ Strongly oppose ☐ Unsure Add any comments below.
	c. Option C: Invest the money in priority projects across New Zealand, regardless of where it is collected ☐ Strongly support ☐ Support ☐ Neutral ☐ Oppose ☐ Strongly oppose ☐ Unsure Please add any additional comments below.
	d. Explain why this is your preferred approach or combination of approaches.
13.	Are there any international approaches to spending money from access charging that you think the Government should consider? ☐ Yes ☐ No ☐ Unsure ☐ No comment Add any additional comments below as to why this approach should be considered.

Part 8 – Working with Iwi (and Hapū)

14.	How can the Government best meet its Treaty obligations in designing and implementing access charging?

Part 9 – Other design questions

15.	Some groups other than the DOC manage land with conservation values. Do you think these groups should be allowed to charge people to access this land, if it meets certain features in Part 7, to help pay for upkeep and improvements? ☐Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ Unsure Add any comments below.

Appendix 2: Key themes on access charging from regional hui with Iwi and Hapū

During public consultation, DOC held 25 regional hui with Iwi and Hapū, which provided an initial introduction to the access charging proposal, and an early opportunity for Treaty partners to provide feedback.

Many views were shared by Iwi and Hapū, and this Appendix does not capture all feedback, or all views. This Appendix provides a high-level summary of the feedback heard during the hui.

The insights from regional hui helped inform DOC's advice but have not been treated as formal submissions. This is because some Iwi and Hapū provided their formal feedback in writing as part of the consultation process. Formal submissions may differ from what was heard during the hui.

General feedback on access charging

- Many Iwi maintain that much/all of conservation land is Iwi land.
- There was general support for the idea of access charging at most hui, depending on how it was implemented.
- Some attendees recommended that Iwi and those with ahi kā connections to whenua should be involved in decisions on whether to charge for access in their rohe, where it should be implemented, who should pay to access PCL, and how the revenue should be used.

Charging Tangata Whenua

- There were mixed views on whether to exempt all Māori from access charging, or just Iwi with mana whenua in that rohe. Both views were commonly expressed.
- Attendees noted that it's important for Iwi to connect to their whenua without any barriers. Others took the view that only kaimahi and volunteers should be exempt from an access charge.
- It was suggested that further engagement is needed on whether/how access charges apply to Iwi with mana whenua.

Charging others

- There was strong support for charging international visitors for access to PCL, from both revenue and visitor management perspectives.

- Some attendees expressed opposition to charging New Zealanders given they already invest in PCL through their taxes, while others supported charging New Zealanders on the basis that this would mean that these visitors would value the land and experience more.
- It was frequently raised that there should be subsidies or discounts for people who cannot afford to pay an access charge. There was also a view that charges for New Zealanders should not be excessive.
- Some expressed that there should be a way for New Zealanders to give koha instead of a mandatory charging regime.
- The question was raised about whether concessionaires (e.g. guides) should be charged for access as this could be seen as double charging (in addition to fees they already pay to DOC to operate on PCL).

Revenue allocation

- Attendees expressed a strong desire to be involved in decisions on how revenue from access charges is allocated, though noted that more work would need to be done to explore what this would look like.
- There was support for reinvesting a large portion of revenue back into the place and region where it was generated, though it was noted that this would favour some regions more than others. Some attendees agreed a mixture of reinvestment options could be appropriate.
- Some Iwi suggested that revenue going into a regional or national pool should be spent on places that have not received investment historically.

Appendix 3: Forest & Bird form submission template on the modernising the conservation system proposals

To the Department of Conservation,

New Zealand's public conservation land is a vital part of who we are as a nation – it's our mountain peaks, ancient rainforests, wetlands, rivers, and more.

New proposals threaten the future of public conservation land – risking high biodiversity value areas being sold off or developed.

It is my individual submission that any changes must:

- **Protect conservation land:** The intrinsic values of all conservation land, including stewardship land, should be protected and preserved. Government should not make it easier to dispose of conservation land if it is considered 'surplus' or to 'support other government priorities'.
- **Consider climate change:** In a warming climate, it's important to protect, restore and grow our areas of forests and wetlands.
- **Prioritise our native plants and animals:** New Zealand already has the highest proportion of threatened species in the world. Charges should only be used as part of an overall government plan to deliver a net, sustained increase in investment in biodiversity and conservation.
- **Keep people connected to nature:** Any charge for access to public conservation land should not deter New Zealanders from connecting with the natural environment of Aotearoa.
- **Let people have their say:** It's important to keep public participation in conservation policy development – having a range of voices means key issues are addressed, and significant policy changes are only proposed when truly necessary.
- **Maintain robust checks and balances:** Aotearoa needs evidence-based conservation policy with independent oversight, it's important that we don't have ministerial overreach or poorly informed national policy changes.

  In response to the discussion documents ***Exploring charging for access to some public conservation land*** and ***Modernising conservation land management***, New Zealanders need the Government to prioritise protection for people and our environment.

Appendix 4: Methodology

Processing submissions

DOC received submissions as responses to DOC's online survey, or via email (including 'unique' submissions and Forest & Bird form submissions).

DOC excluded submissions that were duplicates or blank submissions. If a submitter made two submissions (e.g. to expand on their previously submitted thoughts, etc.), their submissions were merged so they were not double counted.

This document summarises views from different groups of submitters (e.g. Iwi and Hapū, and stakeholders like conservation groups). The online survey gave submitters the option to identify as one of the following:

- interested individual
- local government (or related entity)
- conservation group
- tourism business
- Iwi, hapū, or Māori organisation
- not-for-profit or club
- industry association
- other.

'Unique' submissions did not usually specify what category of submitter they should be identified as. Many online survey responses were categorised inconsistently with each other. For consistent analysis, judgements made on which category to group some submitters in.

Quantitative analysis

The online survey included multi-choice questions, e.g. where submitters could indicate if they agreed or disagreed with a proposal. Responses from these questions were the basis for most statistics in this document.

For a few key questions, DOC transcribed the views of 'unique' submitters into the same multi-choice format. This allowed DOC to quantitively analyse the views of 'unique' submitters, which created more representative statistics.

Forest & Bird form submissions made up approximately two-thirds of all submissions. This form did not respond to the specific consultation questions, so could not be used in the statistics. Each Forest & Bird form submission was

treated as an individual submission and included the overall qualitative thematic analyses of submitters' views. See Appendix 3 for a copy of the form submission.

DOC used MAXQDA software to generate overall statistics, and to see how different categories of submitters responded to the multi-choice questions.

Qualitative analysis

DOC read submissions as a whole and used MAXQDA software to 'tag' each submission with key themes and issues.

To summarise the views of all submitters on a particular theme or issue, DOC undertook a thematic analysis. This was done by reading all the segments that had been tagged with each key theme or issue and noted emerging patterns. When reading segments under each key theme or issue, DOC staff could see which submission the segment had come from, and who had written it.

DOC extracted the tagged segments of submissions falling into each submitter category for each key theme and issue. A thematic analysis of this information allowed DOC to find patterns amongst the views of different categories of submitters.

The specific and/or unique views of different types of submitters have been highlighted under key questions. To improve the readability of this document, types of submitters are sometimes grouped together:

- 'Iwi and Hapū and Māori organisations' includes views from Treaty partners and some individual Iwi and Hapū members.
- 'Recreation, hunting and fishing' includes views from not-for-profits, clubs, and some NGOs.
- 'Conservation boards and environmental groups' includes views from conservation boards, community environmental groups, and national environmental NGOs.
- 'Tourism stakeholders' includes views from tourism businesses, industry groups, and Regional Tourism Organisations.

This also allowed us to be more flexible and better represent the views of important groups of stakeholders that were not specified in the original categories of submitters (e.g. hunters and fishers).

Limitations and disclaimers

The summarised views do not represent the views of all submitters.

In some places, DOC used direct or paraphrased quotes to illustrate key themes raised by submitters. To improve the readability of this document, DOC corrected any spelling or grammatical errors in quoted statements from submitters.

Appendix 5: International examples and other evidence raised by submitters

Several consultation questions asked submitters for international examples and other evidence they thought Government could learn from (see Questions 2b, 4 and 13). Many submitters provided personal stories of their own experiences with access charges overseas or provided 'leads' for DOC to investigate without much further detail. The six most mentioned countries with access charging models that submitters thought Government should consider are set out in Table 14.

Table 14: International examples

Country:	Comments:
Canada (raised by 87 submitters)	• The Canadian Parks Pass was specified by some. • Submitters mostly viewed the pass approach positively, generally from the perspective of an international visitor. • Many appreciated that access for locals was free. • Some commented the fees were appropriate for the services provided, and enhanced the visitor experience. • There was some concern for how the model impacted access for indigenous communities. • Banff was raised as a specific example by 21 submitters.
USA (raised by 83 submitters)	• The America the Beautiful pass was specified by some. • Submitters mostly viewed the pass approach positively, generally from the perspective of an international visitor. • Some saw the system as too prohibitive to entry, or too commercialised. • Some said that how the US model is implemented (e.g. at entry kiosks) would not work everywhere in NZ. • There was some concern for how the model impacted access for indigenous communities. • Specific examples raised included Yellowstone (by 24 submitters) and Yosemite (by 13).
Australia (raised by 57 submitters)	• Compared to the Canadian and US examples, submitters had mixed views of the various access charging models used in Australia but there was generally still support. • The option to buy different types of park passes was appreciated, and some said the fee was reflected in the quality of the infrastructure. • Others felt that charging prohibited access for some people, and resulted in a disconnect from nature. • There was some concern for how the model impacted access for indigenous communities.

	• Specific examples raised included Tasmania (by 17 submitters), Kosciusko (by 10) and Uluru (by 7).
UK (raised by 22 submitters)	• The National Trust was specified by some. • Many spoke positively of the UK's free access, but with charges for specific services like parking. • Some spoke of the Forestry England paid parking system used as a good way to implement a form of an access charge, with membership options for discounted rates. • One submitter commented that the decentralised management of conservation land made any charges overly complex.
Scotland *(specifically)* (raised by 14 submitters)	• The Scotland Forestry Commission booking system was specified by some. • Many commented on Scotland's 'right to roam,' viewing the free public access it guarantees favourably. • The 'right to roam' is deeply engrained in their culture, making any attempt to charge for access difficult with public backlash. • Revenue is raised through hunting permits, given the high demand for red deer stalking.
Iceland (raised by 7 submitters)	• Iceland's tourism tax model and/or previous Nature Pass were specified as an alternative to a general access charge. • Submitters spoke positively of Iceland's free access, but with charges for specific services like parking.

A few submitters said that the discussion document misrepresents access charges as being more popular than they are internationally. They cited Sweden, Norway, Finland, Denmark, Germany, France, Spain and England as being among the countries that do not charge for access.

Another said further work needs to be done to ensure if international examples are used, they are good models from countries with high performing conservation systems. This includes examining how revenue from access charges compares to other revenue streams supporting their conservation work and estates.

Some submitters felt there should be less emphasis on looking for answers overseas, given the uniqueness of New Zealand's context. Varying sizes of conservation estates, populations, tourist numbers, existing charges and other variables will impact on the overall efficacy of access charges. This makes access charging models hard to compare between countries.

Some international examples of conservation funding models as alternatives to charging for access were raised. Many were about levels of central government funding. Other models included:

- Tasmania - Tourism Operator Contribution Scheme, requiring increased concession fees for tour operators (who gain exclusive operating rights), and nearby hotels to contribute a share of profits to conservation
- British Columbia, Canada - Natural Resource Benefit Sharing, requiring eligible extractive industry businesses to contribute a share of profits to conservation, and adventure tourism operators to pay premium concession rates for exclusive areas
- Slovenia – Ecological Fund, a corporate environmental responsibility tax on large businesses operating near protected areas
- Estonia – Digital Conservation Fund, using blockchain technology to create voluntary digital 'guardian' programmes
- Scotland – Corporate Wilderness Partnership, requiring eligible renewable energy companies to contribute a share of their profits to conservation

Some gave international examples of places where visitor caps are used (e.g. Galapagos National Park) with the benefit of managing visitor numbers and maintaining ecological integrity. Others suggested alternative tools to manage visitor demand (e.g. the lottery system for the United States' Pacific Crest Trail).

Some submitters provided articles and academic research as evidence for the Government to consider. DOC has compiled these for future investigation. Some of the topics included in the evidence provided by submitters included:

- how user fees can disproportionately impact low-income people
- how revenue from access charging cannot be the only solution to funding conservation
- how to raise revenue with access charges without exacerbating inequalities in access, and the benefits of differential pricing between domestic and international visitors
- how widespread access charges are globally, and benchmarking fees
- the health and wellbeing benefits of conservation in New Zealand and the impact of nature on human health.